



**AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY**  
**TITLE V OPERATING PERMIT**

Permit No.: 150-97-TV

Plant ID: 0073

Effective Date: 24 August 2000

Expiration Date: 31 August 2005

Admin. Revision: 17 November 2000

UTM Northing: 4239.1

UTM Easting: 628.5

SIC: 3711

NAICS: 336112

AFS: 00073

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

**Kentucky Truck Plant Ford Motor Company  
3001 Chamberlain Lane  
Louisville, Kentucky 40241**

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Responsible Official: Frank N. Foley

Applicant for Permit: Ford Motor Company

Title of Responsible Official: Plant Manager

Date Application Received: 22 April 1997

Date Application Administratively Complete: 5 June 1997

Date Public Notice Given: 21 May 2000

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Reviewing Engineer (68)

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Air Pollution Control Officer

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### Abbreviations and Acronyms

|                  |   |
|------------------|---|
| AC               | - Additional Condition                            |
| AFS              | - AIRS Facility Subsystem                         |
| AIRS             | - Aerometric Information Retrieval System         |
| APCD             | - Air Pollution Control District                  |
| ASL              | - Adjusted Significant Level                      |
| atm              | - Atmosphere                                      |
| BACT             | - Best Available Control Technology               |
| Btu              | - British Thermal Unit                            |
| °C               | - Degrees Centigrade                              |
| CEMS             | - Continuous Emission Monitoring System           |
| CAAA             | - Clean Air Act Amendments (15 November 1990)     |
| cf               | - Cubic foot                                      |
| DOE              | - District Only Enforceable                       |
| °F               | - Degrees Fahrenheit                              |
| gal              | - Gallon  |
| HAP              | - Hazardous Air Pollutant                         |
| Hg               | - Mercury   |
| hr               | - hour  |
| lbs              | - Pounds  |
| l                | - Liter   |
| MACT             | - Maximum Achievable Control Technology           |
| m                | - Meter   |
| mg               | - Milligram                                       |
| mm               | - Millimeter                                      |
| MM               | - Million   |
| MOCS             | - Management of Change System                     |
| NAICS            | - North American Industrial Classification System |
| NSR              | - New Source Review                               |
| NO <sub>x</sub>  | - Nitrogen oxides                                 |
| NSPS             | - New Source Performance Standards                |
| PM               | - Particulate Matter                              |
| PM <sub>10</sub> | - Particulate matter less than 10 microns         |
| ppm              | - Parts per million                               |
| PSD              | - Prevention of Significant Deterioration         |
| PMP              | - Preventive Maintenance Plan                     |
| psia             | - Pounds per square inch absolute                 |
| RACT             | - Reasonably Available Control Technology         |
| RTO              | - Regenerative Thermal Oxidizer                   |
| SIC              | - Standard Industrial Classification              |
| SIP              | - State Implementation Plan                       |
| SO <sub>2</sub>  | - Sulfur dioxide                                  |
| TAL              | - Threshold Ambient Limit                         |
| TAP              | - Toxic Air Pollutant                             |

tpy - Tons per year  
UTM - Universal Transverse Mercator  
VOC - Volatile Organic Compound

### **Preamble**

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.



### General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

***US EPA - Region IV  
Air Enforcement Branch  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-8960***

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
  - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
  - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
  - ii. The permitted facility was at the time being properly operated.
  - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
  - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

- 6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
- 7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
- 8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.

11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)

12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)

13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:

- a. Enter the premises to inspect any emissions-related activity or records required in this permit.
- b. Have access to and copy records required by this permit.
- c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
- d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.

(Regulation 2.16, section 4.3.2)

14. **Monitoring and Related Record keeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner

or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.

24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:
- a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
  - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
  - c. Knowingly making any false statement in any permit application.
  - d. Noncompliance with Regulation 1.07, section 4.2; or
  - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)

33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.
35. **Submittal of Reports, Data, Notifications, and Applications**
- a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

*Air Pollution Control District of Jefferson County  
850 Barret Ave  
Louisville, KY 40204-1745*

- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

*US EPA - Region IV  
APTMD - 12th floor  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-3104*

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

| FEDERALLY ENFORCEABLE REGULATIONS |   |
|-----------------------------------|---|
| Regulation                        | Title   |
| 1.01                              | General Application of Regulations and Standards                    |
| 1.02                              | Definitions   |
| 1.03                              | Abbreviations and Acronyms  |
| 1.04                              | Performance Tests   |
| 1.05                              | Compliance with Emission Standards and Maintenance Requirements     |
| 1.06                              | Source Self-Monitoring and Reporting                                |
| 1.07                              | Emissions During Startups, Shutdowns, Malfunctions, and Emergencies |
| 1.08                              | Administrative Procedures   |
| 1.09                              | Prohibition of Air Pollution  |
| 1.10                              | Circumvention   |
| 1.11                              | Control of Open Burning   |

| <b>FEDERALLY ENFORCEABLE REGULATIONS</b> |  |
|--|--|
| <b>Regulation</b>                        | <b>Title</b>   |
| 1.14                                     | Control of Fugitive Particulate Emissions  |
| 2.01                                     | General Application  |
| 2.02                                     | Air Pollution Regulation Requirements and Exemptions   |
| 2.03                                     | Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits         |
| 2.07                                     | Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits |
| 2.09                                     | Causes for Permit Suspension   |
| 2.10                                     | Stack Height Considerations  |
| 2.11                                     | Air Quality Model Usage  |
| 2.16                                     | Title V Operating Permits  |
| 4.01                                     | General Provisions for Emergency Episodes  |
| 4.02                                     | Episode Criteria   |
| 4.03                                     | General Abatement Requirements   |
| 4.07                                     | Episode Reporting Requirements   |
| 5.01                                     | General Provisions (for Hazardous Air Pollutants)  |
| 5.03                                     | Potential Hazardous Emissions  |
| 6.01                                     | General Provisions (for <i>Existing Affected Facilities</i> )  |
| 6.02                                     | Emission Monitoring for Existing Sources   |
| 7.01                                     | General Provisions (for <i>New Affected Facilities</i> )   |

| <b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b> |   |
|--|---|
| <b>Regulation</b>                            | <b>Title</b>  |
| 1.12   | Control of Nuisances  |
| 1.13   | Control of Objectionable Odors in the Ambient Air                                   |
| 2.08   | Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees |
| 8.03   | Commuter Vehicle Testing Requirements   |

**Kentucky Truck Plant, Ford Motor Company Part 70 Emissions Caps**

| <b>Part 70 Emissions Caps</b> |                   |                  |
|-------------------------------|-------------------|------------------|
| <b>Pollutant</b>              | <b>pounds/day</b> | <b>tons/year</b> |
| VOC                           | 14,341.5          | 1,598.2          |
| PM                            | n/a               | 39.98            |
| NO <sub>x</sub>               | n/a               | 125.0            |
| SO <sub>2</sub>               | n/a               | 1.5              |
| CO                            | n/a               | 45.5             |

**Part 70 Emission Cap Additional Conditions:**

The owner or operator shall maintain all records and emission calculations as described below to demonstrate compliance with the part 70 emission caps shown in the table above. Further, compliance with all other permit conditions and applicable regulations identified within this permit shall be demonstrated using the methods prescribed for each Emission Unit and for each Emission Point.

1. Compliance with applicable LAER emission rate and periodic (daily and annual) mass emission limits for the e-coat, guidecoat and topcoat systems shall be demonstrated using the record keeping and emission calculations described in "Protocol for Determining Daily VOC Emission Rate of Automobile and Light-Duty Truck Topcoat Operations, EPA 450/3-88-018, December, 1988."
2. Compliance with mass VOC emission limitations for sealer, black-out/wax, glass installation and purge/cleaning solvent operations, shall be demonstrated using mass balance calculation methods. Monthly material usage data and the applicable VOC content of each material shall be kept. Daily emission rates shall be determined by prorating monthly usage based on daily production levels.

$$VOC \text{ Value} = \sum_{i=1}^n U_i V_i (1 - C_i D_i)$$

Where:

U = material usage

V = VOC content

C = capture efficiency



D = destruction efficiency  
i = number of operating days

The owner or operator shall correct capture and destruction efficiency values as appropriate to reflect equipment malfunction, downtime or other periods of reduced performance. Daily usage of each material shall be prorated from monthly values based on daily production:

$$U_{Daily} = U_{Monthly} \frac{P_{Daily}}{P_{Monthly}}$$

Where:

$U_{Daily}$  = material usage for a particular calendar day  
 $U_{Monthly}$  = recorded material usage for a particular month  
 $P_{Daily}$  = recorded vehicle production for a particular day  
 $P_{Monthly}$  = total vehicle production for a particular month

For these operations, the VOC content of each material used shall be determined using U.S. EPA Reference Method 24 or an approved alternative method.

3. To demonstrate compliance with plant-wide  $NO_x$  emission limits and to determine  $PM_{10}$  emissions associated with natural gas combustion, the owner or operator shall maintain monthly plant-wide natural gas usage records. Daily emissions shall be determined using prorated daily usage rates (based on production) and appropriate U.S. EPA AP-42 Emission Factors or vendor emissions data.

$$NO_x/PM_{10} \text{ Value} = \sum_{i=1}^n U_i EF (1 - C_i)$$

Where:

U = material usage  
 EF = emission factor  
 C = control efficiency  
 i = number of operating days

4. To demonstrate compliance with  $PM_{10}$  emission limits, the owner or operator shall maintain monthly material usage and emission calculation records. Daily emissions shall be determined using prorated daily usage rates, tested or derived transfer efficiency rates and tested or vendor derived particulate removal efficiency values.

$$PM_{10} \text{ Value} = \sum_{i=1}^n U_i (1 - TE_i)(1 - RE_i) + PM_{NG}$$

Where:

U = material usage

TE = transfer efficiency

RE = particulate removal efficiency

PM<sub>NG</sub> = particulate from natural gas combustion (as determined above)

i = number of operating days

5. The owner or operator shall report quarterly to the District the following:
  - a. The beginning and ending date of the reporting period.
  - b. Pollutant monitored
  - c. Year-to-date emissions for each pollutant, except for VOCs, for which daily and year-to-date emissions shall be reported

These reports shall be made no later than 30 days following the end of each quarter.

(Regulation 2.16, sections 4.1.9.1.2, 4.1.9.2, and 4.1.9.3)

#### **Part 70 Emission Cap Comments/Explanations:**

1. The Part 70 Emission Caps are set at levels equal to the sum of the current allowables for the units affected by the caps.
2. New Source Review established criteria allowing an agency to presume the source-specific allowable emissions for the unit are equivalent to the actual emission for each of the individual units under it. Changes, operational or physical, resulting in emissions below the caps cannot produce significant increases in emissions.
3. The production caps (vehicles/day limits) have been eliminated with the implementation of the Part 70 Emission Caps.

| <b>Plant-wide TAP Allowable Emission Rates</b> |   |
|--|---|
| <b>TAP</b>                                     | <b>Allowable Emission Rate (lbs/hr)</b> |
| Methyl ethyl ketone                            | 30.413                                  |
| Toluene  | 0.765                                   |
| Acetone  | 4.579                                   |
| Methanol                                       | 0.298                                   |
| Toluene 2,4-di-isocyanate                      | 0.002                                   |
| Xylenes  | 9.034                                   |
| Di-acetone alcohol                             | 1.667                                   |
| Potassium hydroxide                            | 0.016                                   |

The plant-wide TAP allowable emission rates above are District only enforceable and are derived from modelling results submitted to the District on 23 September 1992. VOC species are included in the Part 70 Emission Caps. Refer to specific Emission Units for monitoring, record keeping, and reporting requirements.

**U-1 Emission Unit Description:** SUV E-Coat; electrocoat prime paint dip tank and cure oven

### U-1 Applicable Regulations

| Federally Enforceable Regulations |   |                         |
|-----------------------------------|---|-------------------------|
| Number                            | Subject   | Sections                |
| 1.05                              | Compliance With Emission Standards Maintenance Requirements   | 1; 3 through 5          |
| 7.08                              | Standards of Performance for New Process Operations   | 1 through 3             |
| 7.12                              | Standards of Performance for New Storage Vessels for Volatile Organic Compounds   | 1 through 5; 7 and 8    |
| 40 CFR 60 Kb                      | Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 | 60.110b through 60.117b |
| 40 CFR 60 MM                      | Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations   | 60.390 through 60.397   |

| District Only Enforceable Regulations |  |                              |
|---------------------------------------|--|------------------------------|
| Number                                | Subject  | Sections                     |
| 1.18                                  | Rule Effectiveness   | 1 through 3                  |
| 5.12                                  | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants | 1 through 5                  |
| 5.14                                  | Hazardous Air Pollutants and Source Categories                                     | 1 and 2                      |
| 7.02                                  | Federal New Source Performance Standards Incorporated by Reference                 | 1.1, 1.23, 1.50; 2 through 5 |

| U-1 Emission Points |   |                          |                     |  |                                    |                |               |                                |
|---------------------|---|--------------------------|---------------------|--|------------------------------------|----------------|---------------|--------------------------------|
| ID                  | Description                             | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard | Compliance Monitoring <sup>†</sup> | Control Device |               | Stack ID                       |
|                     |   |                          |                     |  |                                    | ID             | Type          |                                |
| E-2                 | Dip Tank and High Temperature Cure Oven | 1.05, Sec 4              | VOC                 | Same as for 40 CFR 60.392 (below)      | NONE                               | C-42           | RTO           | S-504 through S-509; and S-553 |
|                     |   | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.d                             | MON                                |                |               |                                |
|                     |   | 40 CFR 60.392            | VOC                 | See AC 1.a                             | MON                                |                |               |                                |
| E-3                 | Scuff Booth                             | 7.08, sec 3.1.2          | PM                  | 2.34 lbs/hr                            | PMP                                | C-1            | Fabric filter | S-510 and S-511                |
|                     |   | 7.08, sec 3.1.1          | Opacity             | < 20%                                  | NONE                               |                |               |                                |
| E-41                | E-Coat Dump (SUV)                       | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.d                             | MON                                | N/A            | N/A           | N/A                            |
|                     |   | 7.12, sec 3.3            | VOC                 | Submerged fill                         | NONE                               |                |               |                                |
|                     |   | 40 CFR 60.110b(c)        | VOC                 | See AC 2.a.vii                         | MON                                |                |               |                                |
| E-42                | E-Coat Dump (SUV)                       | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.d                             | MON                                | N/A            | N/A           | N/A                            |
|                     |   | 7.12, sec 3.3            | VOC                 | Submerged fill                         | NONE                               |                |               |                                |
|                     |   | 40 CFR 60.110b(c)        | VOC                 | See AC 2.a.vii                         | MON                                |                |               |                                |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Parametric monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required; **PMP** - Preventive Maintenance Program, See Additional Conditions.

**U-1 Additional Conditions:**1. **Standards** (Regulation 2.16, section 4.1.1)

- a. VOC: The owner or operator shall be subject to the following emission limits (40 CFR 60.392):
  - i. When the solids turnover ratio ( $R_T$ ) is  $\geq 0.16$ , not exceed 1.4 lbs/gal (0.17 kg/l) of applied coating solids.
  - ii. When the  $R_T$  is  $\geq 0.04$  and  $< 0.16$ , not exceed the weight per gallon limit calculated as follows:  
$$0.17 \times 350^{(0.160 - R_T)} \text{ kg of VOC per liter of applied coating solids.}$$
  - iii. When the  $R_T$  is  $< 0.040$ , not be subject to an emission limit established pursuant to this regulation.
- b. PM: See Emission Points Table.
- c. Opacity: See Comment 1.
- d. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 18.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

- a. VOC:
  - i. Monitor ongoing compliance by calculating monthly, a daily a volume-weighted average of the coatings (including resin, pigment, and flow control additive) used. Procedures used for this determination shall be those of Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Truck Topcoat Operations, EPA-450/3-88-018, December 1988.
  - ii. During operation of this line, maintain the RTO combustion chamber temperature at  $\geq 760^\circ \text{C}$ , except that it shall not in a three hour average have a temperature drop of more than  $28^\circ \text{C}$ , monitored to an accuracy within  $2.5^\circ \text{C}$ ; or other temperature, as determined during the latest stack test, monitored to an accuracy within  $2.5^\circ \text{C}$ . Additionally, the RTO shall have a minimum destruction efficiency of 95% and a minimum residence time of 0.5 seconds. The temperature shall be recorded using a circular type chart recorder, which shall be calibrated and maintained according to the manufacturer's specifications.
  - iii. This line shall not be operated unless all control devices are being properly operated, except in the event of a shutdown, startup, malfunction, or emergency; and where the requirements of Regulation 1.07 are met.

- iv. Measure capture efficiency pursuant to Regulation 1.05, Section 3, except that EPA Method 204F, Volatile Organic Compounds Content in Liquid Input Stream (Distillation Approach), shall be used to determine VOC input.
- v. Use EPA Method 24 to determine the amount of VOC in the Coating. The following equation may be used as an alternate method to demonstrate compliance:

$$VOC_w = \sum_{i=1}^n \frac{V_i C_i}{V_t}$$

Where:

**VOC<sub>w</sub>** = the daily weighted average coating VOC content, as applied; and less water and exempt solvents, expressed in pounds of VOC per gallon of coating.

**n** = number of different coatings used on a coating line a given day.

**V<sub>1</sub>** = the volume of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**C<sub>1</sub>** = the VOC content of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**V<sub>t</sub>** = total volume of all coatings applied each day on a coating line, less water and exempt solvents.

- vi. Meet the standards specified in 40 CFR 60.392, as calculated using the prescribed transfer efficiency of 40 CFR 60.393(c)(1)(i)(C) for the monthly weighted average mass of VOC emitted per volume of applied coating solids.
  - vii. For Emission Points E-140 through E-142, the owner or operator shall keep capacity and dimension records of storage tanks subject to Kb as specified in 40 CFR 60.116(b).
- b. PM: The owner or operator shall not operate the scuff booth unless the particulate filters are installed and operating properly. The owner shall follow good operating practices for the particulate filters, including periodic inspection, routine maintenance as recommended by the manufacturer, and prompt repair of any defects. Proper operation of the fabric filter shall be ensured by maintaining records of inspections and routine maintenance activities and shall make these records available to the District upon request.
  - c. Opacity: See Comment 1.
  - d. TAPs:

- i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits. The specific indicators of control device performance are specified elsewhere in this permit.
  - ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
  - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. VOC: Perform record keeping for VOCs for 40 CFR 60.395 and 1.05, Section 4:
    - i. Record daily the quantity of resin, pigment, and flow control additive added to the electrocoat system.
    - ii. Determine and record daily usage of each material by prorating monthly consumption based on daily vehicles produced.
    - iii. Calculations shall incorporate control efficiency and shall include downtime adjustments to account for increased emissions during the period the RTO was not operating. The owner or operator shall also maintain records of control device downtimes and bypasses, including the date and duration of each occurrence.
  - b. PM: See Additional Condition 2.b.
  - c. Opacity: See Comment 1.
  - d. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
  - a. Emission Unit ID number and Control ID number;
  - b. The beginning and ending date of the reporting period;
  - c. Identification of the operating parameters being monitored;
  - d. Number, duration, and cause of all exceedances (or a negative declaration, if none);



- e. Description of the corrective action taken for each exceedance; and
- f. Occurrences and duration of each downtime and bypass.

**U-1 Comments/Explanations:**

1. Due to the nature of the process of E-3, no opacity monitoring is required, as the likelihood of visible emissions is nil.
2. Additional Condition 2.d is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-2 Emission Unit Description:** SUV Sealer; sealer application and gel curing oven

### U-2 Applicable Regulations

| Federally Enforceable Regulations |   |                |
|-----------------------------------|---|----------------|
| Number                            | Subject   | Sections       |
| 1.05                              | Compliance With Emission Standards Maintenance Requirements                                       | 1; 3 through 5 |
| 7.59                              | Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations | 1 through 7    |

| District Only Enforceable Regulations |  |             |
|---------------------------------------|--|-------------|
| Number                                | Subject  | Sections    |
| 5.12                                  | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants | 1 through 5 |
| 5.14                                  | Hazardous Air Pollutants and Source Categories                                     | 1 and 2     |

| U-2 Emission Points |                                 |                          |                     |  |                                    |                |      |                |
|---------------------|---------------------------------|--------------------------|---------------------|--|------------------------------------|----------------|------|----------------|
| ID                  | Description                     | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard                         | Compliance Monitoring <sup>†</sup> | Control Device |      | Stack ID       |
|                     |                                 |                          |                     |  |                                    | ID             | Type |                |
| E-4                 | Sealer Application and Gel Oven | 1.05, Sec 4              | VOC                 | Same as for 7.59, sec 3.1.4 (below)                            | MON                                | N/A            | N/A  | S-12 and S-512 |
|                     |                                 | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b   | MON                                |                |      |                |
|                     |                                 | 7.59, sec 3.1.4          | VOC                 | 3.0 lbs/gal, less H <sub>2</sub> O and exempt VOCs, as applied | MON                                |                |      |                |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions.

**U-2 Additional Conditions:**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC: See Emission Points Table.
  - b. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC: Demonstrate ongoing compliance with Regulation 7.59, section 3.1.4 by recording daily changes of drums and totes or through monthly inventory checks. Determine daily usage of each material by prorating monthly consumption based on daily vehicles produced. (Regulation 7.59, section 6.1.6)
  - b. TAPs:
    - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
    - ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
    - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. VOC: See Additional Condition 2.a.
  - b. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
  - a. Emission Unit ID number and Control ID number;
  - b. The beginning and ending date of the reporting period;
  - c. Identification of the operating parameters being monitored;

- d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and
- e. Description of the corrective action taken for each exceedance.

**U-2 Comments/Explanations:**

Additional Condition 2.b is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-3 Emission Unit Description:** SUV Guidecoat; guidecoat (primer surfacer) is applied after truck bodies have been primed

### U-3 Applicable Regulations

| Federally Enforceable Regulations |   |                          |
|-----------------------------------|---|--------------------------|
| Number                            | Subject   | Sections                 |
| 1.05                              | Compliance With Emission Standards Maintenance Requirements                             | 1; 3 through 5           |
| 7.08                              | Standards of Performance for New Process Operations                                     | 1 through 3              |
| 40 CFR 60<br>MM                   | Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations | 60.390 through<br>60.397 |

| District Only Enforceable Regulations |  |                        |
|---------------------------------------|--|------------------------|
| Number                                | Subject  | Sections               |
| 1.18                                  | Rule Effectiveness   | 1 through 3            |
| 5.12                                  | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants | 1 through 5            |
| 5.14                                  | Hazardous Air Pollutants and Source Categories                                     | 1 and 2                |
| 7.02                                  | Federal New Source Performance Standards Incorporated by Reference                 | 1.1, 1.50; 2 through 5 |

| U-3 Emission Points |   |  |                     |  |                                    |   |  |  |
|---------------------|---|--|---------------------|--|------------------------------------|---|--|--|
| ID                  | Description   | Applicable Regulation(s)   | Pollutant/ Standard | Allowable Emission/ Equipment Standard | Compliance Monitoring <sup>†</sup> | Control Device                          |  | Stack ID   |
|                     |   |  |                     |  |                                    | ID                                      | Type   |  |
| E-5 and E-6         | Paint Spray Booth with Water Wash; and High Temperature Curing Oven | 1.05, Sec 4  | VOC                 | Same as for 40 CFR 60.392 (below)      | NONE                               | E-5: C-5, C-6, and C-2<br><br>E-6: C-42 | E-5: Water curtain, carbon adsorber, and RTO<br><br>E-6: RTO | E-5: S-10, S-11, S-13 through S-17; S-551, and S-552 |
|                     |   | 5.12, secs 1 and 5   | TAP(s)              | See AC 2.d                             | MON                                |   |  | E-6: S-18 through S-21; S-512, and S-553             |
|                     |   | 40 CFR 60.392  | VOC                 | See AC 1.a                             | MON                                |   |  |  |
| E-7                 | Scuff Booth*  | 7.08, sec 3.1.2  | PM                  | 2.34 lbs/hr                            | PMP                                | C-3                                     | Fabric filter  | S-513 and S-514                                      |
|                     |   | 7.08, sec 3.1.1  | Opacity             | < 20%                                  | NONE                               |   |  |  |
| E-106               | Paint Kitchen   | Utilized for SUV Guidecoat and SUV Topcoat. See U-4/5.   |                     |  |                                    | N/A                                     | N/A  | S-315 through S-317                                  |
| E-146               | Paint Sludge Pit  | Utilized for SUV Guidecoat and SUV Topcoat. See U-4/5. VOC emissions are accounted for in SUV Guidecoat and SUV Topcoat emissions. |                     |  |                                    | N/A                                     | N/A  | S-579  |

\*This scuff booth is also utilized for U-4/5.

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required; **PMP** - Preventive Maintenance Program, See Additional Conditions.

**U-3 Additional Conditions:**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC: The owner or operator shall be subject to the following emission limit 15.1 lbs VOC/gal (1.8 kg/l) of applied coating solids, less water and exempt solvents. (40 CFR 60.392)
  - b. PM: See Emission Points Table.
  - c. Opacity: See Emission Points Table.
  - d. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC:
    - i. Monitor ongoing compliance by calculating monthly, a daily a volume-weighted average of the coatings used. Procedures used for this determination shall be those of Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Truck Topcoat Operations, EPA-450/3-88-018, December 1988.
    - ii. During operation of this line, maintain the RTO combustion chamber temperature at  $\geq 760^{\circ}\text{C}$ , except that it shall not in a three hour average have a temperature drop of more than  $28^{\circ}\text{C}$ , monitored to an accuracy within  $2.5^{\circ}\text{C}$ ; or other temperature, as determined during the latest stack test, monitored to an accuracy within  $2.5^{\circ}\text{C}$ . Additionally, the RTO shall have a minimum destruction efficiency of 95% and a minimum residence time of 0.5 seconds. The temperature shall be recorded using a circular type chart recorder, which shall be calibrated and maintained according to the manufacturer's specifications.
    - iii. This line shall not be operated unless all control devices are being properly operated, except in the event of a shutdown, startup, malfunction, or emergency; and where the requirements of Regulation 1.07 are met.
    - iv. Measure capture efficiency pursuant to Regulation 1.05, Section 3, except that EPA Method 204F, Volatile Organic Compounds Content in Liquid Input Stream (Distillation Approach), shall be used to determine VOC input.
    - v. Use EPA Method 24 to determine the amount of VOC in the Coating. The following equation may be used as an alternate method to demonstrate compliance:

$$VOC_w = \sum_{i=1}^n \frac{V_i C_i}{V_t}$$

Where:

**VOC<sub>w</sub>** = the daily weighted average coating VOC content, as applied; and less water and exempt solvents, expressed in pounds of VOC per gallon of coating.

**n** = number of different coatings used on a coating line a given day.

**V<sub>i</sub>** = the volume of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**C<sub>i</sub>** = the VOC content of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**V<sub>t</sub>** = total volume of all coatings applied each day on a coating line, less water and exempt solvents.

- b. PM: The owner or operator shall not operate the scuff booth unless the particulate filters are installed and operating properly. The owner shall follow good operating practices for the particulate filters, including periodic inspection, routine maintenance as recommended by the manufacturer, and prompt repair of any defects. Proper operation of the fabric filter shall be ensured by maintaining records of inspections and routine maintenance activities and shall make these records available to the District upon request.
- c. Opacity: See Comment 1.
- d. TAPs:
  - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits. The specific indicators of control device performance are specified elsewhere in this permit.
  - ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
  - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)



- a. VOC: Perform record keeping for VOCs for 40 CFR 60.395 and 1.05, Section 4:
    - i. Record the quantity of paint and dilution solvent added to the guidecoat (primer surfacer) application daily.
    - ii. Combine daily pour records with monthly tank level readings to determine monthly paint usage.
    - iii. Determine daily paint usage of each material by prorating consumption based on daily surface area coated.
    - iv. Determine daily usage and emissions by using calculation procedures in Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Truck Topcoat Operations, EPA-450/3-88-018.
    - v. Calculations shall incorporate control efficiency and shall include downtime adjustments to account for increased emissions during the period the RTO was not operating. The owner or operator shall also maintain records of control device downtimes and bypasses, including the date and duration of each occurrence.
    - vi. Report all instances of non-compliance to the District no later than fifteen (15) days after the occurrence has been confirmed, notwithstanding Regulation 1.07.
    - vii. Meet the standards specified in 40 CFR 60.392, as calculated, using the prescribed transfer efficiency of 40 CFR 60.393(c)(1)(i)(C) for the monthly weighted average mass of VOC emitted per volume of applied coating solids.
  - b. PM: See Additional Condition 2.b.
  - c. Opacity: See Comment 1.
  - d. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
- a. Emission Unit ID number and Control ID number;
  - b. The beginning and ending date of the reporting period;
  - c. Identification of the operating parameters being monitored;
  - d. Number, duration, and cause of all exceedances (or a negative declaration, if none);

- e. Description of the corrective action taken for each exceedance; and
- f. Occurrences and duration of each downtime and bypass.

**U-3 Comments/Explanations:**

1. Due to the nature of the process of E-7, no opacity monitoring is required, as the likelihood of visible emissions is nil.
2. Additional Condition 2.d is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-4/5 Emission Unit Description:** SUV Topcoat/Final Repair; SUV truck body finish coating in spray booths and ovens

### U-4/5 Applicable Regulations

| Federally Enforceable Regulations |   |                       |
|-----------------------------------|---|-----------------------|
| Number                            | Subject   | Sections              |
| 1.05                              | Compliance With Emission Standards Maintenance Requirements                             | 1; 3 through 5        |
| 7.08                              | Standards of Performance for New Process Operations                                     | 1 through 3           |
| 40 CFR 60 MM                      | Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations | 60.390 through 60.397 |

| District Only Enforceable Regulations |  |                        |
|---------------------------------------|--|------------------------|
| Number                                | Subject  | Sections               |
| 1.18                                  | Rule Effectiveness   | 1 through 3            |
| 5.11                                  | Standards of Performance for Existing Sources Emitting Toxic Air Pollutants        | 1 through 6            |
| 5.12                                  | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants | 1 through 5            |
| 5.14                                  | Hazardous Air Pollutants and Source Categories                                     | 1 and 2                |
| 7.02                                  | Federal New Source Performance Standards Incorporated by Reference                 | 1.1, 1.50; 2 through 5 |

| U-4/5 Emission Points |   |   |                     |  |                                    |   |  |  |
|-----------------------|---|---|---------------------|--|------------------------------------|---|--|--|
| ID                    | Description                                   | Applicable Regulation(s)  | Pollutant/ Standard | Allowable Emission/ Equipment Standard | Compliance Monitoring <sup>†</sup> | Control Device                                |  | Stack ID   |
|                       |   |   |                     |  |                                    | ID  | Type   |  |
| E-8, E-9, and E-20    | SUV Topcoat Booth, Oven, and Spot Repair Area | 1.05, sec 4   | VOC                 | Same as for 40 CFR 60.392 (below)      | NONE                               | E-8: C-4 through C-6<br>E-9: C-6<br>E-20: N/A | E-8: Water wash, carbon adsorber, and RTO<br>E-9: RTO<br>E-20: N/A | E-8: S-53, S-515 through S-530; S-551, and S-552 |
|                       |   | 5.11, secs 1 and 6  | TAP(s)              | See AC 2.d                             | MON                                |   |  | E-9: S-531 through S-536; S-24, S-25, and S-552  |
|                       |   | 5.12, secs 1 and 5  | TAP(s)              | See AC 2.d                             | MON                                |   |  |  |
|                       |   | 7.08, sec 3.1.2   | PM                  | 2.34 lbs/hr                            | PMP                                |   |  |  |
|                       |   | 7.08, sec 3.1.1   | Opacity             | < 20%                                  | MON                                |   |  |  |
|                       |   | 40 CFR 60.392   | VOC                 | See AC 1.a                             | MON                                |   |  | E-20: S-73 and S-74                              |
| E-103                 | Final Repair/Topcoat Paint Spray Booth        | Utilized for SUV and Super Duty. VOC emissions are accounted for in the SUV and Super Duty Topcoat Emissions. |                     |  |                                    | C-41  | Fabric filter  | S-281 and S-282                                  |
| E-104                 | Final Repair/Topcoat Low Temperature Oven     | Utilized for SUV and Super Duty. VOC emissions are accounted for in the SUV and Super Duty Topcoat Emissions. |                     |  |                                    | N/A   | N/A  | S-283  |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required; **PMP** - Preventive Maintenance Program, See Additional Conditions.

**U-4/5 Additional Conditions:**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC: The owner or operator shall be subject to the following emission limits (40 CFR 60.392):
    - i. Topcoat: 11.3 lbs VOC/gal (1.35 kg/l) of applied coating solids, less water and exempt solvents.
    - ii. Final Repair: 4.8 lbs VOC/gal (0.58 kg/l) of applied coating solids, less water and exempt solvents.
  - b. PM: See Emission Points Table.
  - c. Opacity: See Emission Points Table.
  - d. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC:
    - i. Monitor ongoing compliance by calculating monthly, a daily a volume-weighted average of the coatings used. Procedures used for this determination shall be those of Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Truck Topcoat Operations, EPA-450/3-88-018, December 1988. As an alternative to daily material usage records, the owner or operator may utilize an appropriate material usage factor determined to be acceptable by the District.
    - ii. During operation of this line, maintain the RTO combustion chamber temperature at  $\geq 760^{\circ}\text{C}$ , except that it shall not in a three hour average have a temperature drop of more than  $28^{\circ}\text{C}$ , monitored to an accuracy within  $2.5^{\circ}\text{C}$ ; or other temperature, as determined during the latest stack test, monitored to an accuracy within  $2.5^{\circ}\text{C}$ . Additionally, the RTO shall have a minimum destruction efficiency of 95% and a minimum residence time of 0.5 seconds. The temperature shall be recorded using a circular type chart recorder, which shall be calibrated and maintained according to the manufacturer's specifications.
    - iii. This line shall not be operated unless all control devices are being properly operated, except in the event of a shutdown, startup, malfunction, or emergency; and where the requirements of Regulation 1.07 are met.

- iv. Measure capture efficiency pursuant to Regulation 1.05, Section 3, except that EPA Method 204F, Volatile Organic Compounds Content in Liquid Input Stream (Distillation Approach), shall be used to determine VOC input.
- v. Use EPA Method 24 to determine the amount of VOC in the Coating. The following equation may be used as an alternate method to demonstrate compliance:

$$VOC_w = \sum_{i=1}^n \frac{V_i C_i}{V_t}$$

Where:

**VOC<sub>w</sub>** = the daily weighted average coating VOC content, as applied; and less water and exempt solvents, expressed in pounds of VOC per gallon of coating.

**n** = number of different coatings used on a coating line a given day.

**V<sub>1</sub>** = the volume of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**C<sub>1</sub>** = the VOC content of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**V<sub>t</sub>** = total volume of all coatings applied each day on a coating line, less water and exempt solvents.

- vi. Meet the standards specified in 40 CFR 60.392, as calculated, using the prescribed transfer efficiency of 40 CFR 60.393(c)(1)(i)(C) for the monthly weighted average mass of VOC emitted per volume of applied coating solids.
- b. PM: See Additional Condition 2.a.iii.
  - c. Opacity:
    - i. To demonstrate compliance with the opacity standard (for Emission Points with required monitoring), conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Points (stacks) identified in the U-4/5 Emission Points Table. No more than four Emission Points shall be observed simultaneously.
    - ii. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute

visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.

- iii. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.c.i. See Comment 1.

d. TAPs:

- i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits. The specific indicators of control device performance are specified elsewhere in this permit.
- ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
- iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. VOC: Perform record keeping for VOCs for 40 CFR 60.395 and 1.05, Section 4:

i. Topcoat:

- 1) Record the quantity of paint and dilution solvent added to the topcoat finish coating application daily.
- 2) Combine daily pour records with monthly tank level readings to determine monthly paint usage.
- 3) Determine daily paint usage of each material by prorating consumption based on daily surface area coated.
- 4) Determine daily usage and emissions by using calculation procedures in the U.S., EPA Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Truck Topcoat Operations, EPA-450/3-88-018.

- 5) Calculations shall incorporate control efficiency and shall include downtime adjustments to account for increased emissions during the period the RTO was not operating. The owner or operator shall also maintain records of control device downtimes and bypasses, including the date and duration of each occurrence.

ii. Final Repair:

- 1) Record daily the quantity and type of paint withdrawn from the topcoat paint circulation system for use in the final repair operation.
- 2) Determine daily VOC emissions based on the topcoat and final repair records.
- 3) As an alternative to daily material usage records, the owner or operator may utilize an appropriate material usage factor determined to be acceptable by the District.

b. PM: None.

c. Opacity: Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

d. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:

- a. Emission Unit ID number and Control ID number;
- b. The beginning and ending date of the reporting period;
- c. Identification of the operating parameters being monitored;
- d. Number, duration, and cause of all exceedances (or a negative declaration, if none);
- e. Description of the corrective action taken for each exceedance;
- f. Occurrences and duration of each downtime and bypass.



**U-4/5 Comment/Explanation:**

Additional Condition 2.d is for demonstrating compliance with Regulations 5.11 and 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-7 Emission Unit Description:** SUV Black-Out, Wax, and Sound Deadner**U-7 Applicable Regulations**

| <b>Federally Enforceable Regulations</b> |   |                 |
|--|---|-----------------|
| <b>Number</b>                            | <b>Subject</b>  | <b>Sections</b> |
| 1.05                                     | Compliance With Emission Standards Maintenance Requirements                                       | 1; 3 through 5  |
| 7.08                                     | Standards of Performance for New Process Operations   | 1 through 3     |
| 7.59                                     | Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations | 1 through 7     |

| <b>District Only Enforceable Regulations</b> |  |                 |
|--|--|-----------------|
| <b>Number</b>                                | <b>Subject</b>   | <b>Sections</b> |
| 5.12   | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants | 1 through 5     |
| 5.14   | Hazardous Air Pollutants and Source Categories                                     | 1 and 2         |

| <b>U-7 Emission Points</b> |  |                                 |                            |  |  |                       |               |                     |
|----------------------------|--|---------------------------------|----------------------------|--|--|-----------------------|---------------|---------------------|
| <b>ID</b>                  | <b>Description</b>   | <b>Applicable Regulation(s)</b> | <b>Pollutant/ Standard</b> | <b>Allowable Emission/ Equipment Standard</b>                  | <b>Compliance Monitoring<sup>†</sup></b> | <b>Control Device</b> |               | <b>Stack ID</b>     |
|                            |  |                                 |                            |  |  | <b>ID</b>             | <b>Type</b>   |                     |
| E-34                       | Black-out Paint, Cavity Wax, and Sound Deadner Spray Booth | 1.05, sec 4                     | VOC                        | Same as for 7.59, sec 3.1.4 (below)                            | NONE                                     | C-24                  | Fabric filter | S-118 through S-123 |
|                            |  | 5.12, secs 1 and 5              | TAP(s)                     | See AC 2.d   | MON                                      |                       |               |                     |
|                            |  | 7.08, sec 3.1.2                 | PM                         | 2.34 lbs/hr  | PMP                                      |                       |               |                     |
|                            |  | 7.08, sec 3.1.1                 | Opacity                    | < 20%  | MON                                      |                       |               |                     |
|                            |  | 7.59, sec 3.1.4                 | VOC                        | 3.0 lbs/gal, less H <sub>2</sub> O and exempt VOCs, as applied | MON                                      |                       |               |                     |

Permit No.: 150-97-TV

Plant ID: 0073

\*Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required; **PMP** - Preventive Maintenance Program, See Additional Conditions.

**U-7 Additional Conditions:**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC: Limit the black-out paint VOC content to 1.24 pounds of VOC per gallon (with water) which equates to 3.0 pounds of VOC per gallon (less water). (Regulation 7.59, section 3.1.4.) The VOC content of cavity wax shall not exceed 2.5 pounds of VOC per gallon. See Comment 1.
  - b. PM: See Emission Points Table.
  - c. Opacity: See Emission Points Table.
  - d. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC: Determine and record daily usage of each material and VOC emissions by prorating monthly consumption based on daily vehicles produced. (Regulation 1.05, Section 4)
  - b. PM: The owner or operator shall not operate the dry filter booth unless the particulate filters are installed and operating properly. The owner shall follow good operating practices for the particulate filters, including periodic inspection, routine maintenance as recommended by the manufacturer, and prompt repair of any defects. Proper operation of the fabric filter shall be ensured by maintaining records of inspections and routine maintenance activities and shall make these records available to the District upon request.
  - c. Opacity:
    - i. To demonstrate compliance with the opacity standard (for Emission Points with required monitoring), conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Points (stacks) identified in the U-7 Emission Points Table. No more than four Emission Points shall be observed simultaneously.
    - ii. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.
    - iii. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator

shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.c.i.

d. TAPs:

- i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits. The specific indicators of control device performance are specified elsewhere in this permit.
- ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
- iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

- a. VOC: See Additional Condition 2.a.
- b. PM: See Additional Condition 2.b.
- c. Opacity: Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.
- d. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:

- a. Emission Unit ID number and Control ID number;
- b. The beginning and ending date of the reporting period;
- c. Identification of the operating parameters being monitored;
- d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and

- e. Description of the corrective action taken for each exceedance.

**U-7 Comments/Explanations:**

1. The VOC standard in Additional Condition 1.a, above, resulted from the emission offset specified in the original permit application of 5 November 1992.
2. Additional Condition 2.d is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-8 Emission Unit Description:** SUV Cleaning Solvent**U-8 Applicable Regulations**

| <b>Federally Enforceable Regulations</b> |  |                 |
|--|--|-----------------|
| <b>Number</b>                            | <b>Subject</b>   | <b>Sections</b> |
| 1.05                                     | Compliance With Emission Standards Maintenance Requirements                          | 1; 3 through 5  |
| 6.17                                     | Standard of Performance for Existing Automobile and Truck Surface Coating Operations | 1 through 4     |
| 7.18                                     | Standards of Performance for New Solvent Metal Cleaning Equipment                    | 1 through 4     |

| <b>District Only Enforceable Regulations</b> |   |                 |
|--|---|-----------------|
| <b>Number</b>                                | <b>Subject</b>  | <b>Sections</b> |
| 5.11   | Standards of Performance for Existing Sources Emitting Toxic Air Pollutants | 1 through 6     |
| 5.14   | Hazardous Air Pollutants and Source Categories                              | 1 and 2         |

| <b>U-8 Emission Points</b> |  |                                 |                            |   |  |                       |             |                 |
|----------------------------|--|---------------------------------|----------------------------|---|--|-----------------------|-------------|-----------------|
| <b>ID</b>                  | <b>Description</b>                             | <b>Applicable Regulation(s)</b> | <b>Pollutant/ Standard</b> | <b>Allowable Emission/ Equipment Standard</b> | <b>Compliance Monitoring<sup>†</sup></b> | <b>Control Device</b> |             | <b>Stack ID</b> |
|                            |  |                                 |                            |   |  | <b>ID</b>             | <b>Type</b> |                 |
| E-105                      | Purge and Cleaning in SUV Truck Assembly Areas | 1.05, Sec 4                     | VOC                        | Same as for 6.17, Sec 3 (below)               | NONE                                     | N/A                   | N/A         | N/A             |
|                            |  | 5.11, secs 1 and 6              | TAP(s)                     | See AC 2.b                                    | MON                                      |                       |             |                 |
|                            |  | 6.17, Sec 3                     | VOC                        | See AC 1.a                                    | MON                                      |                       |             |                 |
| E-36                       | Cleaning SUV Paint Pots                        | 1.05, Sec 4                     | VOC                        | Same as for 6.17, Sec 3 (below)               | NONE                                     | N/A                   | N/A         | S-125           |
|                            |  | 5.11, secs 1 and 6              | TAP(s)                     | See AC 2.b                                    | MON                                      |                       |             |                 |
|                            |  | 6.17, Sec 3                     | VOC                        | See AC 1.a                                    | MON                                      |                       |             |                 |

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Plant ID: 0073

| U-8 Emission Points |                                  |                          |                     |  |                                    |                |      |          |
|---------------------|----------------------------------|--------------------------|---------------------|--|------------------------------------|----------------|------|----------|
| ID                  | Description                      | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard | Compliance Monitoring <sup>†</sup> | Control Device |      | Stack ID |
|                     |                                  |                          |                     |  |                                    | ID             | Type |          |
| N/A                 | Solvent Metal Cleaning Equipment | 7.18, Sec 4              | VOC                 | See AC 1.a.v.                          | NONE                               | N/A            | N/A  | N/A      |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required.



**U-8 Additional Conditions:****1. Standards** (Regulation 2.16, section 4.1.1)

a. VOC: The owner or operator shall follow the procedure below to minimize VOC emissions from purge and cleaning operations:

i. Body Wipe:

- 1) Solvents shall be dispensed from pails equipped with properly functioning lids that will remain closed when not in use
- 2) Miscible solvents shall be mixed with deionized water
- 3) Sticky tack cloths shall be used where possible

ii. Applicator Paint Purging:

- 1) The automatic spray applicators will incorporate will incorporate a purge paint and solvent recovery system that will collect ninety percent (90%) of the purged materials
- 2) Compressed air will be used to enhance scrubbing action
- 3) Water-based base coat will be purged with deionized water and solvent

iii. Spray Booth and Equipment Cleaning:

- 1) Pressurized water and solvent will be used to remove uncured paint
- 2) Sprayable and paper masking will be used, where possible, to minimize cleaning
- 3) High-pressure water scrubber will be used to remove over spray from floor grating
- 4) A non-VOC-containing coating will be applied to booth walls to act as a masking, which shall be removed by low-pressure water or steam
- 5) Manual spray applicators and hoses shall be removed and immersed in a drum of solvent, then wiped clean
- 6) Some portions of the automatic spray applicator will be covered with removable paper masking

iv. Other Areas:

- 1) Paint track-out from booths shall be removed by mopping with a detergent containing solvent.
    - 2) Removable floor mats and disposable paper covering will be used in high-traffic areas to minimize the need for the previous item.
  - v. For all cold solvent parts washers, the owner or operator shall comply with the standards of Regulation 7.18, Sections 4.1 through 4.3.
  - b. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC: See Additional Condition 1.a.
  - b. TAPs:
    - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
    - ii. Continue to comply with Regulation 5.11 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
    - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. VOC:
    - i. See Additional Condition 1.a.
    - ii. For all cold solvent parts washers, the owner or operator shall keep the following records, pursuant to Regulation 7.18, Section 4.4:
      - 1) The name and address of the solvent supplier;
      - 2) The date of the purchase;
      - 3) The type of the solvent; and
      - 4) The vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).

- b. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
- 4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
  - a. Emission Unit ID number and Control ID number;
  - b. The beginning and ending date of the reporting period;
  - c. Identification of the operating parameters being monitored;
  - d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and
  - e. Description of the corrective action taken for each exceedance.

**U-8 Comments/Explanations:**

- 1. Additional Condition 2.b is for demonstrating compliance with Regulation 5.11, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.
- 2. Additional Conditions 1.a.i through iii, involving work practice standards only, have no monitoring requirements, as such would be impractical.

**U-10 Emission Unit Description:** SUV Glass Installation**U-10 Applicable Regulations**

| <b>Federally Enforceable Regulations</b> |   |                 |
|--|---|-----------------|
| <b>Number</b>                            | <b>Subject</b>  | <b>Sections</b> |
| 1.05                                     | Compliance With Emission Standards Maintenance Requirements                                       | 1; 3 through 5  |
| 7.59                                     | Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations | 1 through 7     |

| <b>District Only Enforceable Regulations</b> |  |                 |
|--|--|-----------------|
| <b>Number</b>                                | <b>Subject</b>   | <b>Sections</b> |
| 5.12   | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants | 1 through 5     |
| 5.14   | Hazardous Air Pollutants and Source Categories                                     | 1 and 2         |

| <b>U-10 Emission Points</b> |  |                                 |                            |  |  |                       |             |                 |
|-----------------------------|--|---------------------------------|----------------------------|--|--|-----------------------|-------------|-----------------|
| <b>ID</b>                   | <b>Description</b>                         | <b>Applicable Regulation(s)</b> | <b>Pollutant/ Standard</b> | <b>Allowable Emission/ Equipment Standard</b>                  | <b>Compliance Monitoring<sup>†</sup></b> | <b>Control Device</b> |             | <b>Stack ID</b> |
|                             |  |                                 |                            |  |  | <b>ID</b>             | <b>Type</b> |                 |
| E-107                       | Glass Installation and Cleaning Procedures | 1.05, Sec 4                     | VOC                        | Same as for 7.59, sec 3.1.4 (below)                            | NONE                                     | N/A                   | N/A         | S-538           |
|                             |  | 5.12, secs 1 and 5              | TAP(s)                     | See AC 2.b   | MON                                      |                       |             |                 |
|                             |  | 7.59, sec 3.1.2                 | VOC                        | 3.5 lbs/gal, less H <sub>2</sub> O and exempt VOCs, as applied | MON                                      |                       |             |                 |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required.

**U-10 Additional Conditions:**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC: Not cause or allow the emission of VOC resulting from the coating of metallic surfaces in excess of the of the applicable emission rate of 3.5 lb of VOC/gal of coating excluding water and exempt solvents, as applied. (Regulation 7.59, section 3.1.2) Compliance shall be demonstrated using the volume-weighted average VOC content for all materials utilized in this Emission Unit. The usage rates of each materials shall be determined as defined in Additional Condition 2.a.
  - b. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC: Maintain the following monthly records to demonstrate ongoing compliance with the corresponding hourly emission limits for VOCs and with Regulation 1.05, Section 4:
    - i. Hours of operation for each booth
    - ii. Calculations of VOC emissions from each facility based on the recorded parameters. Calculations of daily usage and VOC emissions from each facility based on the recorded parameters by prorating monthly net usage based on daily vehicle production.
    - iii. Determine daily usage of each material and VOC emissions by prorating monthly consumption based on daily vehicles produced.
  - b. TAPs:
    - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
    - ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
    - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. VOC: See Additional Condition 2.a.

- b. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
- a. Emission Unit ID number and Control ID number;
  - b. The beginning and ending date of the reporting period;
  - c. Identification of the operating parameters being monitored;
  - d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and
  - e. Description of the corrective action taken for each exceedance.

**U-10 Comments/Explanations:**

Additional Condition 2.b is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-11 Emission Unit Description:** Storage Tanks**U-11 Applicable Regulations**

| <b>Federally Enforceable Regulations</b> |   |                         |
|--|---|-------------------------|
| <b>Number</b>                            | <b>Subject</b>  | <b>Sections</b>         |
| 7.12                                     | Standards of Performance for New Storage Vessels for Volatile Organic Compounds   | 1 through 5; 7 and 8    |
| 40 CFR 60 Kb                             | Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 | 60.110b through 60.117b |

| <b>District Only Enforceable Regulations</b> |  |                       |
|--|--|-----------------------|
| <b>Number</b>                                | <b>Subject</b>   | <b>Sections</b>       |
| 5.11   | Standards of Performance for Existing Sources Emitting Toxic Air Pollutants        | 1 through 6           |
| 5.12   | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants | 1 through 5           |
| 5.14   | Hazardous Air Pollutants and Source Categories                                     | 1 and 2               |
| 7.02   | Federal New Source Performance Standards Incorporated by Reference                 | 1.23; and 2 through 5 |

| <b>U-11 Emission Points</b> |  |                                 |                            |  |  |                       |             |                 |
|-----------------------------|--|---------------------------------|----------------------------|--|--|-----------------------|-------------|-----------------|
| <b>ID</b>                   | <b>Description</b>                         | <b>Applicable Regulation(s)</b> | <b>Pollutant/ Standard</b> | <b>Allowable Emission/ Equipment Standard</b>                      | <b>Compliance Monitoring<sup>†</sup></b> | <b>Control Device</b> |             | <b>Stack ID</b> |
|                             |  |                                 |                            |  |  | <b>ID</b>             | <b>Type</b> |                 |
| E-39                        | Tank 3, Spill Containment, North Tank Farm | 5.12, secs 1 and 5              | TAP(s)                     | See AC 2.b   | MON                                      | N/A                   | N/A         | N/A             |
|                             |  | 7.12, sec 3.3                   | VOC                        | Submerged fill (only for materials with vapor pressure < 1.5 psia) | NONE                                     |                       |             |                 |
|                             |  | 40 CFR 60.110b(b)               | VOC                        | See AC 1.a   | MON                                      |                       |             |                 |

| U-11 Emission Points |  |                          |                     |   |                                    |                |      |          |
|----------------------|--|--------------------------|---------------------|---|------------------------------------|----------------|------|----------|
| ID                   | Description                                    | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard                      | Compliance Monitoring <sup>†</sup> | Control Device |      | Stack ID |
|                      |  |                          |                     |   |                                    | ID             | Type |          |
| E-40                 | Tank 4, Spill Containment, Motor Convoy Area   | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b  | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 2.8.3          | VOC                 | Exempt (UST with annual turnover < two times tank capacity) | NONE                               |                |      |          |
|                      |  | 40 CFR 60.110b(b)        | VOC                 | See AC 1.a  | MON                                |                |      |          |
| E-44                 | Tank 8, Diesel Fuel, North Tank Farm           | 7.12, sec 3.3            | VOC                 | Exempt (Vapor pressure < 1.5 psia)                          | NONE                               | N/A            | N/A  | N/A      |
|                      |  | 40 CFR 60.110b(c)        | VOC                 | See AC 1.a  | MON                                |                |      |          |
| E-45                 | Tank 9, Diesel Fuel, North Tank Farm           | 7.12, sec 3.3            | VOC                 | Exempt (Vapor pressure < 1.5 psia)                          | NONE                               | N/A            | N/A  | N/A      |
|                      |  | 40 CFR 60.110b(c)        | VOC                 | See AC 1.a  | MON                                |                |      |          |
| E-46                 | Tank 10, Diesel Fuel, North Tank Farm          | 7.12, sec 3.3            | VOC                 | Exempt (Vapor pressure < 1.5 psia)                          | NONE                               | N/A            | N/A  | N/A      |
|                      |  | 40 CFR 60.110b(c)        | VOC                 | See AC 1.a  | MON                                |                |      |          |
| E-47                 | Tank 11, Diesel Fuel, North Tank Farm          | 7.12, sec 3.3            | VOC                 | Exempt (Vapor pressure < 1.5 psia)                          | NONE                               | N/A            | N/A  | N/A      |
|                      |  | 40 CFR 60.110b(c)        | VOC                 | See AC 1.a  | MON                                |                |      |          |
| E-50                 | Tank 14, Brake Fluid, North Tank Farm          | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b  | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 3.3            | VOC                 | Exempt (Vapor pressure < 1.5 psia)                          | NONE                               |                |      |          |
| E-53                 | Tank 17, Transmission Fluid, North Tank Farm   | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b  | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 3.3            | VOC                 | Exempt (Vapor pressure < 1.5 psia)                          | NONE                               |                |      |          |
| E-54                 | Tank 18, Power Steering Fluid, North Tank Farm | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b  | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 3.3            | VOC                 | Exempt (Vapor pressure < 1.5 psia)                          | NONE                               |                |      |          |



| U-11 Emission Points |  |                          |                     |  |                                    |                |      |          |
|----------------------|--|--------------------------|---------------------|--|------------------------------------|----------------|------|----------|
| ID                   | Description  | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard | Compliance Monitoring <sup>†</sup> | Control Device |      | Stack ID |
|                      |  |                          |                     |  |                                    | ID             | Type |          |
| E-58                 | Tank 22, Antifreeze, North Tank Farm   | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 3.3            | VOC                 | Exempt (Vapor pressure < 1.5 psia)     | NONE                               |                |      |          |
| E-59                 | Tank 78, Purge Paint Reclaim, North Tank Farm                                | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 3.3            | VOC                 | Submerged fill                         | NONE                               |                |      |          |
| E-60                 | Tank 23, Windshield Washer Fluid, North Tank Farm                            | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-63                 | Tank 25, Sulfuric Acid, DI Water   | 5.11, secs 1 and 6       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-64                 | Tank 26, Caustic Soda, DI Water  | 5.11, secs 1 and 6       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-74                 | Tank 37, Sulfuric Acid, Wastewater Treatment                                 | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-75                 | Tank 38, Caustic Soda, Wastewater Treatment                                  | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-78                 | Tank 76, Water-based Purge, Paint Department; cap 10,000 gal; installed 1994 | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 3.3            | VOC                 | Exempt (Vapor pressure < 1.5 psia)     | NONE                               |                |      |          |
| E-79                 | Tank 77, Water-based Purge, Paint Department; cap 10,000 gal; installed 1994 | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 3.3            | VOC                 | Exempt (Vapor pressure < 1.5 psia)     | NONE                               |                |      |          |
| E-80                 | Tank 74, Solvent Purge, Paint Department; cap 10,000 gal; installed 1994     | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 3.3            | VOC                 | Submerged fill                         | NONE                               |                |      |          |

| U-11 Emission Points |  |                          |                     |  |                                    |                |      |          |
|----------------------|--|--------------------------|---------------------|--|------------------------------------|----------------|------|----------|
| ID                   | Description  | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard | Compliance Monitoring <sup>†</sup> | Control Device |      | Stack ID |
|                      |  |                          |                     |  |                                    | ID             | Type |          |
| E-81                 | Tank 75, Solvent Purge, Paint Department; cap 10,000 gal; installed 1994 | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 3.3            | VOC                 | Submerged fill                         | NONE                               |                |      |          |
| E-112 and E-113      | Tank 40, E-Coat Wastewater Treatment (2 tanks)                           | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-114 through E-118  | Tank 41, Wastewater Treatment (5 tanks)                                  | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-119 through E-122  | Tank 42, Sludge Decant (4 tanks)   | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-125                | Tank 62, Car Wash (Sodium Hydroxide), Paint Department                   | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-126                | Tank 63, Phosphate Dip Cleaner (Sodium Hydroxide), Paint Department      | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-127                | Tank 64, Phosphate Bath (Phosphoric Acid), Paint Department              | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-128                | Tank 65, Phosphate Bath (Phosphoric Acid), Paint Department              | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-129                | Tank 66, E-Coat Resin, Paint Department                                  | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 3.3            | VOC                 | Submerged fill                         | NONE                               |                |      |          |
|                      |  | 40 CFR 60.110b(b)        | VOC                 | See AC 1.a                             | MON                                |                |      |          |

| U-11 Emission Points |  |                          |                     |  |                                    |                |      |          |
|----------------------|--|--------------------------|---------------------|--|------------------------------------|----------------|------|----------|
| ID                   | Description  | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard | Compliance Monitoring <sup>†</sup> | Control Device |      | Stack ID |
|                      |  |                          |                     |  |                                    | ID             | Type |          |
| E-131                | Tank 68, Grate Coating, Paint Department                               | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 3.3            | VOC                 | Exempt (Vapor pressure < 1.5 psia)     | NONE                               |                |      |          |
| E-133                | Tank 71, E-Coat, Wastewater Treatment                                  | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-134                | Tank 70, Used Oil, Wastewater Treatment; cap 1,000 gal; installed 1994 | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 3.3            | VOC                 | Exempt (Vapor pressure < 1.5 psia)     | NONE                               |                |      |          |
| E-143                | E-Coat Resin (SUV)   | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
|                      |  | 7.12, sec 3.3            | VOC                 | Submerged fill                         | NONE                               |                |      |          |
|                      |  | 40 CFR 60.110b(c)        | VOC                 | See AC 1.a                             | MON                                |                |      |          |
| E-144                | Phosphate Storage (SUV)  | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |
| E-145                | Phosphate Cleaner (SUV)  | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b                             | MON                                | N/A            | N/A  | N/A      |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No (or no additional) Compliance Monitoring is required.

**U-11 Additional Conditions:**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC: See Emission Points Table.
  - b. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC: None.
  - b. TAPs:
    - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
    - ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
    - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. VOC: The owner or operator shall keep capacity and dimension records of storage tanks subject to Kb as specified in 40 CFR 60.116 (b).
  - b. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
  - a. Emission Unit ID number and Control ID number;
  - b. The beginning and ending date of the reporting period;
  - c. Identification of the operating parameters being monitored;
  - d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and

- e. Description of the corrective action taken for each exceedance.

**U-11 Comments/Explanations:**

Additional Condition 2.b is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-12 Emission Unit Description:** Plant-wide Product Fueling and Plant Vehicle Refueling

### U-12 Applicable Regulations

| Federally Enforceable Regulations |  |                |
|-----------------------------------|--|----------------|
| Number                            | Subject  | Sections       |
| 1.05                              | Compliance With Emission Standards Maintenance Requirements  | 1; 3 through 5 |
| 2.04                              | Construction or Modification of Major Sources in or Impacting Upon Non-Attainment Areas (Emission Offset Requirements) | 1 through 10   |
| 7.15                              | Standards of Performance for Gasoline Transfer to New Service Station Storage Tanks (Stage I Vapor Recovery)           | 1 through 6    |
| 7.25                              | Standard of Performance for New Sources Using Volatile Organic Compounds   | 1 through 5    |

| District Only Enforceable Regulations |  |             |
|---------------------------------------|--|-------------|
| Number                                | Subject  | Sections    |
| 1.18                                  | Rule Effectiveness                             | 1 through 3 |
| 5.14                                  | Hazardous Air Pollutants and Source Categories | 1 and 2     |

| U-12 Emission Points |  |                          |                    |                                       |                                    |                      |            |                         |
|----------------------|--|--------------------------|--------------------|---------------------------------------|------------------------------------|----------------------|------------|-------------------------|
| ID                   | Description                                | Applicable Regulation(s) | Pollutant/Standard | Allowable Emission/Equipment Standard | Compliance Monitoring <sup>†</sup> | Control Device       |            | Stack ID                |
|                      |  |                          |                    |                                       |                                    | ID                   | Type       |                         |
| E-82                 | Three Fueling Stations with Vapor Recovery | 7.25, Sec 3.1            | VOC                | See Comment                           | MON                                | C-26, C-27, and C-42 | Three RTOs | S-171, S-172, and S-580 |
| E-37                 | T1: Gasoline UST, North Tank Farm          | 1.05, Sec 4              | VOC                | See AC 3.b                            | MON                                | N/A                  | N/A        | N/A                     |
|                      |  | 7.15, sec 3              | VOC                | Stage I vapor recovery system         | NONE                               |                      |            |                         |
| E-38                 | T2: Gasoline UST, North Tank Farm          | 1.05, Sec 4              | VOC                | See AC 3.b                            | MON                                | N/A                  | N/A        | N/A                     |
|                      |  | 7.15, sec 3              | VOC                | Stage I vapor recovery system         | NONE                               |                      |            |                         |

Permit No.: 150-97-TV

Plant ID: 0073

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No (or no additional) Compliance Monitoring is required.

**U-12 Additional Conditions:****1. Standards** (Regulation 2.16, section 4.1.1)

VOC:

- a. Storage tanks, Emission Points E-37 and E-38, shall be equipped with the following:
  - i. A submerged fill pipe;
  - ii. If the gasoline storage tank is equipped with a separate gauge well, a gauge well drop tube shall be installed which extends to within six inches of the bottom of the tank;
  - iii. Vent line restrictions on the affected facility; and
  - iv. Vapor balance system and vapor tight connections on the liquid fill and vapor return hoses. The cross-sectional area of the vapor return hose and any other vapor return passages in the circuit connecting the vapor space in the service station tank to that of the truck tank must be at least 50% of the liquid fill hose cross-sectional area for each tank and free of flow restrictions to achieve acceptable recovery. The vapor balance equipment must be maintained according to the manufacturer's specifications. The type, size and design of the vapor balance system are subject to the approval of the District.
- b. Control equipment, for vehicle fueling/refueling (Emission Points E-82 and E-137), the owner or operator shall maintain a gasoline fueling/refueling vapor collection and destruction system pursuant to Regulation 7.25, section 3.1 (BACT). See Comment.

**2. Monitoring** (Regulation 2.16, section 4.1.9.1.2)

VOC:

- a. Storage tanks: To demonstrate ongoing compliance with Regulation 1.05, Section 4, record the quantity of gasoline used to fuel vehicles.
- b. Control equipment:
  - i. The owner or operator shall daily:
    - 1) Check burner monitoring box for proper burner operation;
    - 2) Verify flame present in oxidizing unit.
    - 3) All repairs must be completed within 5 working days.



- ii. The owner or operator shall monthly:
    - 1) Check fueling nozzles and hoses for abrasion and tears, if found, replace the damaged part;
    - 2) Check the storage tank fill points for tightness;
    - 3) If a two point vapor recovery system on the storage tank, check rubber gaskets for tares, verify spring loaded valves properly operate and tank refill caps have rubber gaskets in good condition; replace any damaged parts; and
    - 4) All repairs must be completed within 5 working days.
  - iii. The owner or operator shall annually:
    - 1) Perform a certified pressure decay test on system to be witnessed by the District;
    - 2) Conduct training for all personnel responsible for the proper maintenance and operation of the system; and
    - 3) All repairs must be completed within 5 working days.
    - 4) Verify pressure vacuum valve on vent pipe is operating properly annually and replace any damaged part.
  - iv. For any tests failed, the owner or operator shall make any required repairs and retest within 30 days.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
- a. Storage Tanks: None.
  - b. Control Equipment:
    - i. The owner or operator shall maintain daily records of the daily inspections. These records shall contain the date and time of the inspection; who performed the inspection; and the results of the inspection.
    - ii. The owner or operator shall maintain records of the monthly inspections. These records shall contain the date and time of the inspection; who performed the inspection; and the results of the inspection.
    - iii. The owner or operator shall maintain records of the annual tests. These records shall contain the date and time of the test; who performed the test; and the results of the test.

- iv. The owner or operator shall maintain a log of the annual training. This log shall contain the names of the trainer and all trainees; a brief summation of the training; and the date of the training.
  - c. The owner or operator shall record total monthly gasoline throughput and make these records available to the District upon request.
- 4. **Reporting** (Regulation 2.16, section 4.1.9.3)
  - a. Storage Tanks: None.
  - b. Control Equipment:

The owner or operator shall report semi-annually the following:

    - i. Results of the annual pressure decay tests;
    - ii. Any corrective action taken or repairs made on the system; and
    - iii. Any repairs that were not completed within the prescribed 5 days; or
    - iv. A negative declaration, if no actions or activities above were required

**U-12 Comment/Explanation:**

The collection unit, located on the plant roof, draws the fuel vapors through a common manifold. When the collected fuel vapor reaches a positive measured pressure of 1 inch water column, it is discharged to the incinerators.

**U-14 Emission Unit Description:** SUV Phosphate**U-14 Applicable Regulations**

| <b>District Only Enforceable Regulations</b> |  |                 |
|--|--|-----------------|
| <b>Number</b>                                | <b>Subject</b>   | <b>Sections</b> |
| 5.12   | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants | 1 through 5     |
| 5.14   | Hazardous Air Pollutants and Source Categories                                     | 1 and 2         |

| <b>U-14 Emission Points</b> |                         |                                 |                            |   |  |                       |             |                     |
|-----------------------------|-------------------------|---------------------------------|----------------------------|---|--|-----------------------|-------------|---------------------|
| <b>ID</b>                   | <b>Description</b>      | <b>Applicable Regulation(s)</b> | <b>Pollutant/ Standard</b> | <b>Allowable Emission/ Equipment Standard</b> | <b>Compliance Monitoring<sup>†</sup></b> | <b>Control Device</b> |             | <b>Stack ID</b>     |
|                             |                         |                                 |                            |   |  | <b>ID</b>             | <b>Type</b> |                     |
| E-84                        | SUV Phosphate           | 5.12, secs 1 and 5              | TAP(s)                     | See AC 2                                      | MON                                      | N/A                   | N/A         | S-500 through S-503 |
| E-140                       | SUV Phosphate Dump Tank | 5.12, secs 1 and 5              | TAP(s)                     | See AC 2                                      | MON                                      | N/A                   | N/A         | N/A                 |
| E-142                       | SUV Phosphate Dump Tank | 5.12, secs 1 and 5              | TAP(s)                     | See AC 2                                      | MON                                      | N/A                   | N/A         | N/A                 |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions.

**U-14 Additional Conditions:**1. **Standards** (Regulation 2.16, section 4.1.1)

TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

TAPs:

- a. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
- b. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
- c. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:

TAPs: None.

**U-14 Comments/Explanations:**

Additional Condition 2 is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-15 Emission Unit Description:** Super Duty Phosphate**U-15 Applicable Regulations**

| <b>District Only Enforceable Regulations</b> |  |                 |
|--|--|-----------------|
| <b>Number</b>                                | <b>Subject</b>   | <b>Sections</b> |
| 5.12   | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants | 1 through 5     |
| 5.14   | Hazardous Air Pollutants and Source Categories                                     | 1 and 2         |

| <b>U-15 Emission Points</b> |                                |                                 |                            |   |  |                       |             |                     |
|-----------------------------|--------------------------------|---------------------------------|----------------------------|---|--|-----------------------|-------------|---------------------|
| <b>ID</b>                   | <b>Description</b>             | <b>Applicable Regulation(s)</b> | <b>Pollutant/ Standard</b> | <b>Allowable Emission/ Equipment Standard</b> | <b>Compliance Monitoring<sup>†</sup></b> | <b>Control Device</b> |             | <b>Stack ID</b>     |
|                             |                                |                                 |                            |   |  | <b>ID</b>             | <b>Type</b> |                     |
| E-86                        | Super Duty Phosphate           | 5.12, secs 1 and 5              | TAP(s)                     | See AC 2                                      | MON                                      | N/A                   | N/A         | S-182 through S-188 |
| E-137                       | Super Duty Phosphate Dump Tank | 5.12, secs 1 and 5              | TAP(s)                     | See AC 2                                      | MON                                      | N/A                   | N/A         | N/A                 |
| E-138                       | Super Duty Phosphate Dump Tank | 5.12, secs 1 and 5              | TAP(s)                     | See AC 2                                      | MON                                      | N/A                   | N/A         | N/A                 |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions.

**U-15 Additional Conditions:**1. **Standards** (Regulation 2.16, section 4.1.1)

TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

TAPs:

- a. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
- b. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
- c. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:

TAPs: None.

**U-15 Comments/Explanations:**

Additional Condition 2 is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-16 Emission Unit Description:** Super Duty E-Coat; electrocoat prime paint dip tank and cure oven

### U-16 Applicable Regulations

| Federally Enforceable Regulations |   |   |
|-----------------------------------|---|---|
| Number                            | Subject   | Sections  |
| 1.05                              | Compliance With Emission Standards Maintenance Requirements   | 1; 3 through 5                                  |
| 2.04                              | Construction or Modification of Major Sources in or Impacting Upon Non-Attainment Areas (Emission Offset Requirements)  | 1 through 5, 6.1, 6.3 through 6.7, 7 through 10 |
| 7.08                              | Standards of Performance for New Process Operations   | 1 through 3                                     |
| 7.12                              | Standards of Performance for New Storage Vessels for Volatile Organic Compounds   | 1 through 5; 7 and 8                            |
| 40 CFR 60 Kb                      | Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 | 60.110b through 60.117b                         |
| 40 CFR 60 MM                      | Standards of Performance for Automobile and Light -Duty Truck Surface Coating Operations  | 60.390 through 60.397                           |

| District Only Enforceable Regulations |  |                             |
|---------------------------------------|--|-----------------------------|
| Number                                | Subject  | Sections                    |
| 1.18                                  | Rule Effectiveness   | 1 through 3                 |
| 5.12                                  | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants | 1 through 5                 |
| 5.14                                  | Hazardous Air Pollutants and Source Categories                                     | 1 and 2                     |
| 7.02                                  | Federal New Source Performance Standards Incorporated By Reference                 | 1.1, 1.23 1.50, 2 through 5 |

| U-16 Emission Points |  |                          |                     |  |                                    |                |               |                                |
|----------------------|--|--------------------------|---------------------|--|------------------------------------|----------------|---------------|--------------------------------|
| ID                   | Description                                    | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard | Compliance Monitoring <sup>†</sup> | Control Device |               | Stack ID                       |
|                      |  |                          |                     |  |                                    | ID             | Type          |                                |
| E-87                 | E-coat Dip Tank and High Temperature Cure Oven | 1.05, Sec 4              | VOC                 | Same as for 40 CFR 60.392 (below)      | NONE                               | C-29           | RTO           | S-189 through S-198; and S-272 |
|                      |  | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.d                             | MON                                |                |               |                                |
|                      |  | 40 CFR 60.392            | VOC                 | See AC 1.a                             | MON                                |                |               |                                |
| E-88                 | Scuff Booth                                    | 7.08, sec 3.1.2          | PM                  | 2.34 lbs/hr                            | PMP                                | C-30           | Fabric filter | S-199 and S-200                |
|                      |  | 7.08, sec 3.1.1          | Opacity             | < 20%                                  | NONE                               |                |               |                                |
| E-135                | E-Coat Dump Tank, Paint Department             | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.d                             | MON                                | N/A            | N/A           | N/A                            |
|                      |  | 7.12, sec 3.3            | VOC                 | Submerged fill                         | NONE                               |                |               |                                |
|                      |  | 40 CFR 60.110b(c)        | VOC                 | See AC 2.a.vii                         | MON                                |                |               |                                |
| E-136                | E-Coat Dump Tank, Paint Department             | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.d                             | MON                                | N/A            | N/A           | N/A                            |
|                      |  | 7.12, sec 3.3            | VOC                 | Submerged fill                         | NONE                               |                |               |                                |
|                      |  | 40 CFR 60.110b(c)        | VOC                 | See AC 2.a.vii                         | MON                                |                |               |                                |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required; **PMP** - Preventive Maintenance Program, See Additional Conditions.



**U-16 Additional Conditions:**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC: Pursuant to 40 CFR 60.392, the owner or operator shall limit the electrocoat (E-Coat) prime line paint VOC content to 1.07 pounds of VOC per gallon of pigment (with water) and 0.09 pounds of VOC per gallon of resin (with water). This combined coating mixture shall not exceed 0.63 pounds of VOC per gallon (less water).
  - b. PM: See Emission Points Table.
  - c. Opacity: See Emission Points Table.
  - d. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC:
    - i. Monitor ongoing compliance by calculating monthly, a daily a volume-weighted average of the coatings (including resin, pigment, and flow control additive) used. Procedures used for this determination shall be those of Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Truck Topcoat Operations, EPA-450/3-88-018, December 1988.
    - ii. During operation of this line, maintain the RTO combustion chamber temperature at  $\geq 760^{\circ}\text{C}$ , except that it shall not in a three hour average have a temperature drop of more than  $28^{\circ}\text{C}$ , monitored to an accuracy within  $2.5^{\circ}\text{C}$ ; or other temperature, as determined during the latest stack test, monitored to an accuracy within  $2.5^{\circ}\text{C}$ . Additionally, the RTO shall have a minimum destruction efficiency of 95% and a minimum residence time of 0.5 seconds. The temperature shall be recorded using a circular type chart recorder, which shall be calibrated and maintained according to the manufacturer's specifications.
    - iii. This line shall not be operated unless all control devices are being properly operated, except in the event of a shutdown, startup, malfunction, or emergency; and where the requirements of Regulation 1.07 are met.
    - iv. Measure capture efficiency pursuant to Regulation 1.05, Section 3, except that EPA Method 204F, Volatile Organic Compounds Content in Liquid Input Stream (Distillation Approach), shall be used to determine VOC input.
    - v. Use EPA Method 24 to determine the amount of VOC in the Coating. The following equation may be used as an alternate method to demonstrate compliance:

$$VOC_w = \sum_{i=1}^n \frac{V_i C_i}{V_t}$$

Where:

**VOC<sub>w</sub>** = the daily weighted average coating VOC content, as applied; and less water and exempt solvents, expressed in pounds of VOC per gallon of coating.

**n** = number of different coatings used on a coating line a given day.

**V<sub>1</sub>** = the volume of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**C<sub>1</sub>** = the VOC content of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**V<sub>t</sub>** = total volume of all coatings applied each day on a coating line, less water and exempt solvents.

- vi. Meet the standards specified in 40 CFR 60.392, as calculated using the prescribed transfer efficiency of 40 CFR 60.393(c)(1)(i)(C) for the monthly weighted average mass of VOC emitted per volume of applied coating solids.
- vii. For Emission Points E-135 and E-136, the owner or operator shall keep capacity and dimension records of storage tanks subject to Kb as specified in 40 CFR 60.116(b).
- b. PM: The owner or operator shall not operate the scuff booth unless the particulate filters are installed and operating properly. The owner shall follow good operating practices for the particulate filters, including periodic inspection, routine maintenance as recommended by the manufacturer, and prompt repair of any defects. Proper operation of the fabric filter shall be ensured by maintaining records of inspections and routine maintenance activities and shall make these records available to the District upon request.
- c. Opacity: See Comment 1.
- d. TAPs:
  - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits. The specific indicators of control device performance are specified elsewhere in this permit.
  - ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.

- iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
- a. VOC: Perform record keeping for VOCs for 40 CFR 60.395 and 1.05, Section 4:
    - i. Record daily the quantity of resin, pigment, and flow control additive added to the electrocoat system.
    - ii. Determine and record daily usage of each material by prorating monthly consumption based on daily vehicles produced.
    - iii. Calculations shall incorporate control efficiency and shall include downtime adjustments to account for increased emissions during the period the RTO was not operating. The owner or operator shall also maintain records of control device downtimes and bypasses, including the date and duration of each occurrence.
  - b. PM: See Additional Condition 2.b.
  - c. Opacity: See Comment 1.
  - d. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
- a. Emission Unit ID number and Control ID number;
  - b. The beginning and ending date of the reporting period;
  - c. Identification of the operating parameters being monitored;
  - d. Number, duration, and cause of all exceedances (or a negative declaration, if none);
  - e. Description of the corrective action taken for each exceedance;
  - f. Occurrences and duration of each downtime and bypass.

**U-16 Comments/Explanations:**

1. Due to the nature of the process of E-88, no opacity monitoring is required, as the likelihood of visible emissions is nil.
2. Additional Condition 2.d is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-17 Emission Unit Description:** Super Duty Sealer; sealer application and gel curing oven

### U-17 Applicable Regulations

| Federally Enforceable Regulations |  |   |
|-----------------------------------|--|---|
| Number                            | Subject  | Sections  |
| 1.05                              | Compliance With Emission Standards Maintenance Requirements  | 1; 3 through 5                                  |
| 2.04                              | Construction or Modification of Major Sources in or Impacting Upon Non-Attainment Areas (Emission Offset Requirements) | 1 through 5, 6.1, 6.3 through 6.7, 7 through 10 |
| 7.59                              | Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations                      | 1 through 7                                     |

| District Only Enforceable Regulations |  |             |
|---------------------------------------|--|-------------|
| Number                                | Subject  | Sections    |
| 5.12                                  | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants | 1 through 5 |
| 5.14                                  | Hazardous Air Pollutants and Source Categories                                     | 1 and 2     |

| U-17 Emission Points |                                 |                          |                     |  |                                    |                |      |                     |
|----------------------|---------------------------------|--------------------------|---------------------|--|------------------------------------|----------------|------|---------------------|
| ID                   | Description                     | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard                         | Compliance Monitoring <sup>†</sup> | Control Device |      | Stack ID            |
|                      |                                 |                          |                     |  |                                    | ID             | Type |                     |
| E-89                 | Sealer Application and Gel Oven | 1.05, Sec 4              | VOC                 | Same as for 7.59, sec 3.1.4 (below)                            | MON                                | N/A            | N/A  | S-201 through S-203 |
|                      |                                 | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.b   | MON                                |                |      |                     |
|                      |                                 | 7.59, sec 3.1.4          | VOC                 | 3.0 lbs/gal, less H <sub>2</sub> O and exempt VOCs, as applied | MON                                |                |      |                     |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions.

**U-17 Additional Conditions:**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC: See Emission Points Table.
  - b. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC: Demonstrate ongoing compliance with Regulation 7.59, section 3.1.4 by recording daily changes of drums and totes or through monthly inventory checks. Determine daily usage of each material by prorating monthly consumption based on daily vehicles produced. (Regulation 7.59, section 6.1.6)
  - b. TAPs:
    - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
    - ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
    - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. VOC: See Additional Condition 2.a.
  - b. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
  - a. Emission Unit ID number and Control ID number;
  - b. The beginning and ending date of the reporting period;
  - c. Identification of the operating parameters being monitored;

- d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and
- e. Description of the corrective action taken for each exceedance.

**U-17 Comments/Explanations:**

Additional Condition 2.b is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-18 Emission Unit Description:** Super Duty Guidecoat; guidecoat (primer surfacer) is applied after truck bodies have been primed

### U-18 Applicable Regulations

| Federally Enforceable Regulations |  |                       |
|-----------------------------------|--|-----------------------|
| Number                            | Subject  | Sections              |
| 1.05                              | Compliance With Emission Standards Maintenance Requirements  | 1; 3 through 5        |
| 2.04                              | Construction or Modification of Major Sources in or Impacting Upon Non-Attainment Areas (Emission Offset Requirements) | 1 through 10          |
| 7.08                              | Standards of Performance for New Process Operations  | 1 through 3           |
| 40 CFR 60 MM                      | Standards of Performance for Automobile and Light -Duty Truck Surface Coating Operations                               | 60.390 through 60.398 |

| District Only Enforceable Regulations |   |             |
|---------------------------------------|---|-------------|
| Number                                | Subject   | Sections    |
| 1.18                                  | Rule Effectiveness  | 1 through 3 |
| 5.12                                  | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants          | 1 through 5 |
| 5.14                                  | Hazardous Air Pollutants and Source Categories  | 1 and 2     |
| 7.02                                  | Federal New Source Performance Standards Incorporated By Reference (40 CFR 60, Subpart MM ) | 1.48        |



| U-18 Emission Points |  |   |                     |  |                                    |                      |                                      |   |
|----------------------|--|---|---------------------|--|------------------------------------|----------------------|--------------------------------------|---|
| ID                   | Description  | Applicable Regulation(s)  | Pollutant/ Standard | Allowable Emission/ Equipment Standard | Compliance Monitoring <sup>†</sup> | Control Device       |                                      | Stack ID                                    |
|                      |  |   |                     |  |                                    | ID                   | Type                                 |   |
| E-90 and E-91        | Paint Spray Booth with Water Wash; and High Temperature Curing | 5.12, secs 1 and 5  | TAP(s)              | See AC 2.d                             | MON                                | C-31, C-32, and C-29 | Water wash, carbon adsorber, and RTO | E-90: S-204 through S-211; S-272, and S-273 |
|                      |  | 40 CFR 60.392   | VOC                 | See AC 1.a                             | MON                                |                      |                                      | E-91: S-212, S-219, and S-272               |
| E-92                 | Guidecoat Scuff Booth  | 7.08, sec 3.1.2   | PM                  | 2.34 lbs/hr                            | PMP                                | C-33                 | Fabric filter                        | S-220 and S-221                             |
|                      |  | 7.08, sec 3.1.1   | Opacity             | < 20%                                  | NONE                               |                      |                                      |   |
| E-108                | Paint Kitchen  | Utilized by Super Duty Guidecoat and Super Duty Topcoat. See U-19/23. |                     |  |                                    | N/A                  | N/A                                  | N/A   |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required; **PMP** - Preventive Maintenance Program, See Additional Conditions.

**U-18 Additional Conditions:**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC: The owner or operator shall Limit the guidecoat (primer surfacer) content to 7.17 pounds of VOC per gallon of applied coating solids, less water and exempt solvents. See Comment 1.
  - b. PM: See Emission Points Table.
  - c. Opacity: See Emission Points Table.
  - d. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC:
    - i. Monitor ongoing compliance by calculating monthly, a daily a volume-weighted average of the coatings used. Procedures used for this determination shall be those of Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Truck Topcoat Operations, EPA-450/3-88-018, December 1988.
    - ii. During operation of this line, maintain the RTO combustion chamber temperature at  $\geq 760^{\circ}\text{C}$ , except that it shall not in a three hour average have a temperature drop of more than  $28^{\circ}\text{C}$ , monitored to an accuracy within  $2.5^{\circ}\text{C}$ ; or other temperature, as determined during the latest stack test, monitored to an accuracy within  $2.5^{\circ}\text{C}$ . Additionally, the RTO shall have a minimum destruction efficiency of 95% and a minimum residence time of 0.5 seconds. The temperature shall be recorded using a circular type chart recorder, which shall be calibrated and maintained according to the manufacturer's specifications.
    - iii. This line shall not be operated unless all control devices are being properly operated, except in the event of a shutdown, startup, malfunction, or emergency; and where the requirements of Regulation 1.07 are met.
    - iv. Measure capture efficiency pursuant to Regulation 1.05, Section 3, except that EPA Method 204F, Volatile Organic Compounds Content in Liquid Input Stream (Distillation Approach), shall be used to determine VOC input.
    - v. Use EPA Method 24 to determine the amount of VOC in the Coating. The following equation may be used as an alternate method to demonstrate compliance:

$$VOC_w = \sum_{i=1}^n \frac{V_i C_i}{V_t}$$

Where:

**VOC<sub>w</sub>** = the daily weighted average coating VOC content, as applied; and less water and exempt solvents, expressed in pounds of VOC per gallon of coating.

**n** = number of different coatings used on a coating line a given day.

**V<sub>1</sub>** = the volume of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**C<sub>1</sub>** = the VOC content of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**V<sub>t</sub>** = total volume of all coatings applied each day on a coating line, less water and exempt solvents.

b. PM: The owner or operator shall not operate the scuff booth unless the particulate filters are installed and operating properly. The owner shall follow good operating practices for the particulate filters, including periodic inspection, routine maintenance as recommended by the manufacturer, and prompt repair of any defects. Proper operation of the fabric filter shall be ensured by maintaining records of inspections and routine maintenance activities and shall make these records available to the District upon request.

c. Opacity: See Comment 1.

d. TAPs:

- i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits. The specific indicators of control device performance are specified elsewhere in this permit.
- ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
- iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

- a. VOC: Perform record keeping for VOCs for 40 CFR 60.395 and 1.05, Section 4:
    - i. Record the quantity of paint and dilution solvent added to the guidecoat (primer surfacer) application daily.
    - ii. Combine daily pour records with monthly tank level readings to determine monthly paint usage.
    - iii. Determine daily paint usage of each material by prorating consumption based on daily surface area coated.
    - iv. Determine daily usage and emissions by using calculation procedures in Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Truck Topcoat Operations, EPA-450/3-88-018.
    - v. Calculations shall incorporate control efficiency and shall include downtime adjustments to account for increased emissions during the period the RTO was not operating. The owner or operator shall also maintain records of control device downtimes and bypasses, including the date and duration of each occurrence.
    - vi. Meet the standards specified in 40 CFR 60.392, as calculated, using the prescribed transfer efficiency of 40 CFR 60.393(c)(1)(i)(C) for the monthly weighted average mass of VOC emitted per volume of applied coating solids.
  - b. PM: See Additional Condition 2.b.
  - c. Opacity: See Comment 1.
  - d. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
- a. Emission Unit ID number and Control ID number;
  - b. The beginning and ending date of the reporting period;
  - c. Identification of the operating parameters being monitored;
  - d. Number, duration, and cause of all exceedances (or a negative declaration, if none);
  - e. Description of the corrective action taken for each exceedance;
  - f. Occurrences and duration of each downtime and bypass.

**U-18 Comments/Explanations:**

1. Due to the nature of the process of E-92, no opacity monitoring is required, as the likelihood of visible emissions is nil.
2. Additional Condition 2.d is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-19/23 Emission Unit Description:** Super Duty Topcoat/Final Repair; medium/heavy truck body finish coating in spray booths and ovens

### U-19/23 Applicable Regulations

| Federally Enforceable Regulations |  |                       |
|-----------------------------------|--|-----------------------|
| Number                            | Subject  | Sections              |
| 1.05                              | Compliance With Emission Standards Maintenance Requirements  | 1; 3 through 5        |
| 2.04                              | Construction or Modification of Major Sources in or Impacting Upon Non-Attainment Areas (Emission Offset Requirements) | 1 through 10          |
| 7.08                              | Standards of Performance for New Process Operations 1,2,3  | 1 through 3           |
| 40 CFR 60, Subpart MM             | Standards of Performance for Automobile and Light -Duty Truck Surface Coating Operations                               | 60.390 through 60.397 |

| District Only Enforceable Regulations |  |              |
|---------------------------------------|--|--------------|
| Number                                | Subject  | Sections     |
| 1.18                                  | Rule Effectiveness   | 1 through 3  |
| 5.12                                  | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants         | 1, through 5 |
| 5.14                                  | Hazardous Air Pollutants and Source Categories   | 1 and 2      |
| 7.02                                  | Federal New Source Performance Standards Incorporated By Reference (40 CFR 60, Subpart MM) | 1.48         |

## U-19/23 Emission Points

| ID            | Description                            | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard | Compliance Monitoring† | Control Device       |                                      | Stack ID  |
|---------------|--|--------------------------|---------------------|--|------------------------|----------------------|--------------------------------------|---|
|               |  |                          |                     |  |                        | ID                   | Type                                 |   |
| E-93 and E-94 | Topcoat Spray Booth and Curing Oven #1 | 1.05, sec 4              | VOC                 | Same as for 40 CFR 60.392 (below)      | NONE                   | C-34, C-32, and C-29 | Water wash, carbon adsorber, and RTO | E-93: S-222 through S-239; S-272, and S-273<br><br>E-94: S-272          |
|               |  | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.d                             | MON                    |                      |                                      |   |
|               |  | 7.08, sec 3.1.2          | PM                  | 2.34 lbs/hr                            | PMP                    |                      |                                      |   |
|               |  | 7.08, sec 3.1.1          | Opacity             | < 20%                                  | MON                    |                      |                                      |   |
|               |  | 40 CFR 60.392            | VOC                 | See AC 1.a                             | MON                    |                      |                                      |   |
| E-95          | Topcoat Scuff Booth #1                 | 7.08, sec 3.1.2          | PM                  | 2.34 lbs/hr                            | PMP                    | C-35                 | Fabric filter                        | S-245 and S-246   |
|               |  | 7.08, sec 3.1.1          | Opacity             | < 20%                                  | NONE                   |                      |                                      |   |
| E-96 and E-97 | Topcoat Spray Booth and Curing Oven #2 | 1.05, sec 4              | VOC                 | Same as for 40 CFR 60.392 (below)      | NONE                   | C-36, C-32, and C-29 | Water wash, carbon adsorber, and RTO | E-96: S-247 through S-264, S-272 and S-273<br><br>E-97: S-265 and S-272 |
|               |  | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.d                             | MON                    |                      |                                      |   |
|               |  | 7.08, sec 3.1.2          | PM                  | 2.34 lbs/hr                            | PMP                    |                      |                                      |   |
|               |  | 7.08, sec 3.1.1          | Opacity             | < 20%                                  | MON                    |                      |                                      |   |
|               |  | 40 CFR 60.392            | VOC                 | See AC 1.a                             | MON                    |                      |                                      |   |
| E-98          | Topcoat Scuff Booth #2                 | 7.08, sec 3.1.2          | PM                  | 2.34 lbs/hr                            | PMP                    | C-37                 | Fabric filter                        | S-270 and S-271   |
|               |  | 7.08, sec 3.1.1          | Opacity             | < 20%                                  | NONE                   |                      |                                      |   |
| E-99          | Topcoat Custom Touch-up System         | 1.05, sec 4              | VOC                 | Same as for 40 CFR 60.392 (below)      | NONE                   | C-38                 | Fabric filter                        | S-274   |
|               |  | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.d                             | MON                    |                      |                                      |   |
|               |  | 40 CFR 60.392            | VOC                 | See AC 1.a                             | MON                    |                      |                                      |   |

| U-19/23 Emission Points |                                   |                          |                     |  |                                    |                |                       |  |
|-------------------------|-----------------------------------|--------------------------|---------------------|--|------------------------------------|----------------|-----------------------|--|
| ID                      | Description                       | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard | Compliance Monitoring <sup>†</sup> | Control Device |                       | Stack ID                               |
|                         |                                   |                          |                     |  |                                    | ID             | Type                  |  |
| E-103 and E-104         | Final Repair Spray Booth and Oven | 1.05, sec 4              | VOC                 | Same as for 40 CFR 60.392 (below)      | NONE                               | C-41 and N/A   | Fabric filter and N/A | E-103: S-281 and S-282<br>E-104: S-283 |
|                         |                                   | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.d                             | MON                                |                |                       |  |
|                         |                                   | 7.08, sec 3.1.2          | PM                  | 2.34 lbs/hr                            | PMP                                |                |                       |  |
|                         |                                   | 7.08, sec 3.1.1          | Opacity             | < 20%                                  | MON                                |                |                       |  |
|                         |                                   | 40 CFR 60.392            | VOC                 | See AC 1.a                             | MON                                |                |                       |  |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required; **PMP** - Preventive Maintenance Program, See Additional Conditions.



**U-19/23 Additional Conditions:**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC: Limit the topcoat line VOC content to 7.06 pounds of VOC per gallon of applied coating solids, less water and exempt solvents. See Comment 1.
  - b. PM: See Emission Points Table.
  - c. Opacity: See Emission points Table.
  - d. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC:
    - i. Monitor ongoing compliance by calculating monthly, a daily a volume-weighted average of the coatings used. Procedures used for this determination shall be those of Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Truck Topcoat Operations, EPA-450/3-88-018, December 1988. As an alternative to daily material usage records, the owner or operator may utilize an appropriate material usage factor determined to be acceptable by the District.
    - ii. During operation of this line, maintain the RTO combustion chamber temperature at  $\geq 760^{\circ}\text{C}$ , except that it shall not in a three hour average have a temperature drop of more than  $28^{\circ}\text{C}$ , monitored to an accuracy within  $2.5^{\circ}\text{C}$ ; or other temperature, as determined during the latest stack test, monitored to an accuracy within  $2.5^{\circ}\text{C}$ . Additionally, the RTO shall have a minimum destruction efficiency of 95% and a minimum residence time of 0.5 seconds. The temperature shall be recorded using a circular type chart recorder, which shall be calibrated and maintained according to the manufacturer's specifications.
    - iii. This line shall not be operated unless all control devices are being properly operated, except in the event of a shutdown, startup, malfunction, or emergency; and where the requirements of Regulation 1.07 are met.
    - iv. Measure capture efficiency pursuant to Regulation 1.05, Section 3, except that EPA Method 204F, Volatile Organic Compounds Content in Liquid Input Stream (Distillation Approach), shall be used to determine VOC input.
    - v. Use EPA Method 24 to determine the amount of VOC in the Coating. The following equation may be used as an alternate method to demonstrate compliance:

$$VOC_w = \sum_{i=1}^n \frac{V_i C_i}{V_t}$$

Where:

**VOC<sub>w</sub>** = the daily weighted average coating VOC content, as applied; and less water and exempt solvents, expressed in pounds of VOC per gallon of coating.

**n** = number of different coatings used on a coating line a given day.

**V<sub>i</sub>** = the volume of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**C<sub>i</sub>** = the VOC content of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**V<sub>t</sub>** = total volume of all coatings applied each day on a coating line, less water and exempt solvents.

- vi. Meet the standards specified in 40 CFR 60.392, as calculated, using the prescribed transfer efficiency of 40 CFR 60.393(c)(1)(i)(C) for the monthly weighted average mass of VOC emitted per volume of applied coating solids.
- b. PM: The owner or operator shall not operate the scuff booths or other dry filter booth unless the particulate filters are installed and operating properly. The owner shall follow good operating practices for the particulate filters, including periodic inspection, routine maintenance as recommended by the manufacturer, and prompt repair of any defects. Proper operation of the fabric filter shall be ensured by maintaining records of inspections and routine maintenance activities and shall make these records available to the District upon request.
- c. Opacity:
  - i. To demonstrate compliance with the opacity standard (for Emission Points with required monitoring), conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Points (stacks) identified in the U-19/23 Emission Points Table. No more than four Emission Points shall be observed simultaneously.
  - ii. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.

- iii. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.c.i. See Comment 3.
- d. TAPs:
- i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits. The specific indicators of control device performance are specified elsewhere in this permit.
  - ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
  - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
- a. VOC: Perform record keeping for VOCs for 40 CFR 60.395 and 1.05, Section 4:
- i. Topcoat:
    - 1) Record the quantity of paint and dilution solvent added to the topcoat finish coating application daily.
    - 2) Combine daily pour records with monthly tank level readings to determine monthly paint usage.
    - 3) Determine daily paint usage of each material by prorating consumption based on daily surface area coated.
    - 4) Determine daily usage and emissions by using calculation procedures in the U.S., EPA Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Truck Topcoat Operations, EPA-450/3-88-018.
    - 5) Calculations shall incorporate control efficiency and shall include downtime adjustments to account for increased emissions during the period the RTO was not operating. The owner or operator shall also maintain records of control

device downtimes and bypasses, including the date and duration of each occurrence.

ii. Final Repair:

1) Record daily the quantity and type of paint withdrawn from the topcoat paint circulation system for use in the final repair operation.

2) Determine daily VOC emissions based on the topcoat and final repair records.

b. PM: See Additional Condition 2.b.

c. Opacity: Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

d. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:

- a. Emission Unit ID number and Control ID number;
- b. The beginning and ending date of the reporting period;
- c. Identification of the operating parameters being monitored;
- d. Number, duration, and cause of all exceedances (or a negative declaration, if none);
- e. Description of the corrective action taken for each exceedance;
- f. Occurrences and duration of each downtime and bypass.

**U-19/23 Comment/Explanation:**

1. The VOC content limit has been determined the Lowest Achievable Emission Rate (LAER) for this Emission Unit.
2. Additional Condition 2.d is for demonstrating compliance with Regulations 5.11 and 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a

surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

3. Due to the nature of the process of E-95 and E-98, no opacity monitoring is required, as the likelihood of visible emissions is nil.

**U-20 Emission Unit Description:** Super Duty Black-Out and Wax; blackout paint and wax application

### U-20 Applicable Regulations

| Federally Enforceable Regulations |  |                |
|-----------------------------------|--|----------------|
| Number                            | Subject  | Sections       |
| 1.05                              | Compliance With Emission Standards Maintenance Requirements  | 1; 3 through 5 |
| 2.04                              | Construction or Modification of Major Sources in or Impacting Upon Non-Attainment Areas (Emission Offset Requirements) | 1 through 10   |
| 7.08                              | Standards of Performance for New Process Operations  | 1 through 3    |
| 7.59                              | Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations                      | 1 through 7    |

| District Only Enforceable Regulations |  |             |
|---------------------------------------|--|-------------|
| Number                                | Subject  | Sections    |
| 5.12                                  | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants | 1 through 5 |
| 5.14                                  | Hazardous Air Pollutants and Source Categories                                     | 1 and 2     |

| U-20 Emission Points |                                    |                          |                     |  |                                    |                |               |                     |
|----------------------|------------------------------------|--------------------------|---------------------|--|------------------------------------|----------------|---------------|---------------------|
| ID                   | Description                        | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard                         | Compliance Monitoring <sup>†</sup> | Control Device |               | Stack ID            |
|                      |                                    |                          |                     |  |                                    | ID             | Type          |                     |
| E-100                | Blackout Paint and Wax Spray Booth | 1.05, Sec 4              | VOC                 | Same as for 7.59, sec 3.1.4 (below)                            | NONE                               | C-39           | Fabric filter | S-275 through S-278 |
|                      |                                    | 5.12, secs 1 and 5       | TAP(s)              | See AC 2.d   | MON                                |                |               |                     |
|                      |                                    | 7.08, sec 3.1.2          | PM                  | 2.34 lbs/hr  | PMP                                |                |               |                     |
|                      |                                    | 7.08, sec 3.1.1          | Opacity             | < 20%  | MON                                |                |               |                     |
|                      |                                    | 7.59, sec 3.1.4          | VOC                 | 3.0 lbs/gal, less H <sub>2</sub> O and exempt VOCs, as applied | MON                                |                |               |                     |

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Plant ID: 0073

<sup>1</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required; **PMP** - Preventive Maintenance Program, See Additional Conditions.

**U-20 Additional Conditions:**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC: Limit the black-out paint VOC content to 1.24 pounds of VOC per gallon (with water) which equates to 3.0 pounds of VOC per gallon (less water). (Regulation 7.59, section 3.1.4.) The VOC content of cavity wax shall not exceed 2.5 pounds of VOC per gallon. See Comment 1.
  - b. PM: See Emission Points Table.
  - c. Opacity: See Emission Points Table.
  - d. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC: Determine and record daily usage of each material and VOC emissions by prorating monthly consumption based on daily vehicles produced. (Regulation 1.05, Section 4)
  - b. PM: The owner or operator shall not operate the dry filter booth unless the particulate filters are installed and operating properly. The owner shall follow good operating practices for the particulate filters, including periodic inspection, routine maintenance as recommended by the manufacturer, and prompt repair of any defects. Proper operation of the fabric filter shall be ensured by maintaining records of inspections and routine maintenance activities and shall make these records available to the District upon request.
  - c. Opacity:
    - i. To demonstrate compliance with the opacity standard (for Emission Points with required monitoring), conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Points (stacks) identified in the U-20 Emission Points Table. No more than four Emission Points shall be observed simultaneously.
    - ii. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.
    - iii. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator



shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.c.i.

d. TAPs:

- i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits. The specific indicators of control device performance are specified elsewhere in this permit.
- ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
- iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

- a. VOC: See Additional Condition 2.a.
- b. PM: See Additional Condition 2.b.
- c. Opacity: Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.
- d. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:

- a. Emission Unit ID number and Control ID number;
- b. The beginning and ending date of the reporting period;
- c. Identification of the operating parameters being monitored;
- d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and

- e. Description of the corrective action taken for each exceedance.

**U-20 Comments/Explanations:**

1. The VOC standard in Additional Condition 1.a, above, resulted from the emission offset specified in the original permit application of 5 November 1992.
2. Additional Condition 2.d is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-22 Emission Unit Description:** Super Duty Purge and Cleaning Solvent; a variety of cleaning operations

### U-22 Applicable Regulations

| Federally Enforceable Regulations |  |                |
|-----------------------------------|--|----------------|
| Number                            | Subject  | Sections       |
| 1.05                              | Compliance With Emission Standards Maintenance Requirements  | 1; 3 through 5 |
| 2.04                              | Construction or Modification of Major Sources in or Impacting Upon Non-Attainment Areas (Emission Offset Requirements) | 1 through 10   |
| 6.17                              | Standard of Performance for Existing Automobile and Truck Surface Coating Operations                                   | 1 through 3    |
| 7.18                              | Standards of Performance for New Solvent Metal Cleaning Equipment  | 1 through 4    |

| District Only Enforceable Regulations |   |             |
|---------------------------------------|---|-------------|
| Number                                | Subject   | Sections    |
| 5.11                                  | Standards of Performance for Existing Sources Emitting Toxic Air Pollutants | 1 through 6 |
| 5.14                                  | Hazardous Air Pollutants and Source Categories                              | 1 and 2     |

| U-22 Emission Points |  |                          |                     |  |                                    |                |      |          |
|----------------------|--|--------------------------|---------------------|--|------------------------------------|----------------|------|----------|
| ID                   | Description                                    | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard | Compliance Monitoring <sup>†</sup> | Control Device |      | Stack ID |
|                      |  |                          |                     |  |                                    | ID             | Type |          |
| E-109                | Purge and Cleaning in Super Duty Assembly Area | 1.05, Sec 4              | VOC                 | Same as for 6.17, Sec 3 (below)        | NONE                               | N/A            | N/A  | N/A      |
|                      |  | 5.11, secs 1 and 6       | TAP(s)              | See AC 2.b                             | MON                                |                |      |          |
|                      |  | 6.17, Sec 3              | VOC                 | See AC 1.a                             | MON                                |                |      |          |
| E-102                | Cleaning Super Duty Paint Pots                 | 1.05, Sec 4              | VOC                 | Same as for 6.17, Sec 3 (below)        | NONE                               | N/A            | N/A  |          |

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| U-22 Emission Points |                                  |                          |                     |  |                                    |                |      |          |
|----------------------|----------------------------------|--------------------------|---------------------|--|------------------------------------|----------------|------|----------|
| ID                   | Description                      | Applicable Regulation(s) | Pollutant/ Standard | Allowable Emission/ Equipment Standard | Compliance Monitoring <sup>†</sup> | Control Device |      | Stack ID |
|                      |                                  |                          |                     |  |                                    | ID             | Type |          |
|                      |                                  | 5.11, secs 1 and 6       | TAP(s)              | See AC 2.b                             | MON                                |                |      |          |
|                      |                                  | 6.17, Sec 3              | VOC                 | See AC 2.b                             | MON                                |                |      |          |
| N/A                  | Solvent Metal Cleaning Equipment | 7.18, Sec 4              | VOC                 | See AC 1.a.v.                          | NONE                               | N/A            | N/A  | N/A      |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required.

**U-22 Additional Conditions:****1. Standards** (Regulation 2.16, section 4.1.1)

- a. VOC: The owner or operator shall follow the procedure below to minimize VOC emissions from purge and cleaning operations:

i. Body Wipe:

- 1) Solvents shall be dispensed from pails equipped with properly functioning lids that will remain closed when not in use
- 2) Miscible solvents shall be mixed with deionized water
- 3) Sticky tack cloths shall be used where possible

ii. Applicator Paint Purging:

- 1) The automatic spray applicators will incorporate will incorporate a purge paint and solvent recovery system that will collect ninety percent (90%) of the purged materials
- 2) Compressed air will be used to enhance scrubbing action
- 3) Water-based base coat will be purged with deionized water and solvent

iii. Spray Booth and Equipment Cleaning:

- 1) Pressurized water and solvent will be used to remove uncured paint
- 2) Sprayable and paper masking will be used, where possible, to minimize cleaning
- 3) High-pressure water scrubber will be used to remove over spray from floor grating
- 4) A non-VOC-containing coating will be applied to booth walls to act as a masking, which shall be removed by low-pressure water or steam
- 5) Manual spray applicators and hoses shall be removed and immersed in a drum of solvent, then wiped clean
- 6) Some portions of the automatic spray applicator will be covered with removable paper masking

iv. Other Areas:

- 1) Paint track-out from booths shall be removed by mopping with a detergent containing solvent.
    - 2) Removable floor mats and disposable paper covering will be used in high-traffic areas to minimize the need for the previous item.
  - v. For all cold solvent parts washers, the owner or operator shall comply with the standards of Regulation 7.18, sections 4.1 through 4.3.
  - b. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC: See Additional Condition 1.a.
  - b. TAPs:
    - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
    - ii. Continue to comply with Regulation 5.11 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
    - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. VOC:
    - i. See Additional Condition 1.a.
    - ii. For all cold solvent parts washers, the owner or operator shall keep the following records, pursuant to Regulation 7.18, section 4.4:
      - 1) The name and address of the solvent supplier;
      - 2) The date of the purchase;
      - 3) The type of the solvent; and
      - 4) The vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).

- b. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
- a. Emission Unit ID number and Control ID number;
  - b. The beginning and ending date of the reporting period;
  - c. Identification of the operating parameters being monitored;
  - d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and
  - e. Description of the corrective action taken for each exceedance.

**U-22 Comments/Explanations:**

- 1. Additional Condition 2.b is for demonstrating compliance with Regulation 5.11, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.
- 2. Additional Conditions 1.a.i through iii, involving work practice standards only, have no monitoring requirements, as such would be impractical.

**U-24 Emission Unit Description:** Super Duty Glass Installation**U-24 Applicable Regulations**

| <b>Federally Enforceable Regulations</b> |  |                 |
|--|--|-----------------|
| <b>Number</b>                            | <b>Subject</b>   | <b>Sections</b> |
| 1.05                                     | Compliance With Emission Standards Maintenance Requirements  | 1; 3 through 5  |
| 2.04                                     | Construction or Modification of Major Sources in or Impacting Upon Non-Attainment Areas (Emission Offset Requirements) | 1 through 10    |
| 7.59                                     | Standards of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations                     | 1 through 7     |

| <b>District Only Enforceable Regulations</b> |  |                 |
|--|--|-----------------|
| <b>Number</b>                                | <b>Subject</b>   | <b>Sections</b> |
| 5.12   | Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants | 1 through 5     |
| 5.14   | Hazardous Air Pollutants and Source Categories                                     | 1 and 2         |

| <b>U-24 Emission Points</b> |  |                                 |                            |  |  |                       |             |                 |
|-----------------------------|--|---------------------------------|----------------------------|--|--|-----------------------|-------------|-----------------|
| <b>ID</b>                   | <b>Description</b>   | <b>Applicable Regulation(s)</b> | <b>Pollutant/ Standard</b> | <b>Allowable Emission/ Equipment Standard</b>                  | <b>Compliance Monitoring<sup>†</sup></b> | <b>Control Device</b> |             | <b>Stack ID</b> |
|                             |  |                                 |                            |  |  | <b>ID</b>             | <b>Type</b> |                 |
| E-110                       | Glass Installation in Vehicles Using Primers, Glass Cleaners and Adhesives | 1.05, Sec 4                     | VOC                        | Same as for 7.59, sec 3.1.4 (below)                            | NONE                                     | N/A                   | N/A         | N/A             |
|                             |  | 5.12, secs 1 and 5              | TAP(s)                     | See AC 2.b   | MON                                      |                       |             |                 |
|                             |  | 7.59, sec 3.1.2                 | VOC                        | 3.5 lbs/gal, less H <sub>2</sub> O and exempt VOCs, as applied | MON                                      |                       |             |                 |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required.



**U-24 Additional Conditions:**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC: Not cause or allow the emission of VOC resulting from the coating of metallic surfaces in excess of the of the applicable emission rate of 3.5 lb of VOC/gal of coating excluding water and exempt solvents, as applied. (Regulation 7.59, section 3.1.2) Compliance shall be demonstrated using the volume-weighted average VOC content for all materials utilized in this Emission Unit. The usage rates of each materials shall be determined as defined in Additional Condition 2.a.
  - b. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC: Maintain the following monthly records to demonstrate ongoing compliance with the corresponding hourly emission limits for VOCs and with Regulation 1.05, Section 4:
    - i. Hours of operation for each booth
    - iii. Calculations of VOC emissions from each facility based on the recorded parameters. Calculations of daily usage and VOC emissions from each facility based on the recorded parameters by prorating monthly net usage based on daily vehicle production.
    - iv. Determine daily usage of each material and VOC emissions by prorating monthly consumption based on daily vehicles produced.
  - b. TAPs:
    - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
    - ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
    - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. VOC: See Additional Condition 2.a.

- b. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
- 4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
  - a. Emission Unit ID number and Control ID number;
  - b. The beginning and ending date of the reporting period;
  - c. Identification of the operating parameters being monitored;
  - d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and
  - e. Description of the corrective action taken for each exceedance.

**U-24 Comments/Explanations:**

Additional Condition 2.b is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

**U-27 Emission Unit Description:** ITR Maintenance Booth**U-27 Applicable Regulations**

| <b>Federally Enforceable Regulations</b> |  |                 |
|--|--|-----------------|
| <b>Number</b>                            | <b>Subject</b>   | <b>Sections</b> |
| 6.09                                     | Standards of Performance for Existing Process Operations                             | 1 through 3     |
| 6.17                                     | Standard of Performance for Existing Automobile and Truck Surface Coating Operations | 1 through 6     |

| <b>District Only Enforceable Regulations</b> |   |                 |
|--|---|-----------------|
| <b>Number</b>                                | <b>Subject</b>  | <b>Sections</b> |
| 5.11   | Standards of Performance for Existing Sources Emitting Toxic Air Pollutants | 1 through 6     |
| 5.14   | Hazardous Air Pollutants and Source Categories                              | 1 and 2         |

| <b>U-27 Emission Points</b> |                       |                                 |                            |   |  |                       |               |                 |
|-----------------------------|-----------------------|---------------------------------|----------------------------|---|--|-----------------------|---------------|-----------------|
| <b>ID</b>                   | <b>Description</b>    | <b>Applicable Regulation(s)</b> | <b>Pollutant/ Standard</b> | <b>Allowable Emission/ Equipment Standard</b>                         | <b>Compliance Monitoring<sup>†</sup></b> | <b>Control Device</b> |               | <b>Stack ID</b> |
|                             |                       |                                 |                            |   |  | <b>ID</b>             | <b>Type</b>   |                 |
| E-26                        | ITR Maintenance Booth | 5.11, secs 1 and 6              | TAP(s)                     | See AC 2.d  | MON                                      | C-17                  | Fabric filter | S-101           |
|                             |                       | 6.09, sec 3.2                   | PM                         | 2.58 lbs/hr   | PMP                                      |                       |               |                 |
|                             |                       | 6.09, sec 3.1                   | Opacity                    | < 20%   | NONE                                     |                       |               |                 |
|                             |                       | 6.17, sec 3.3                   | VOC                        | 11.3 lbs/gal (applied coating solids, less water and exempt solvents) | MON                                      |                       |               |                 |

<sup>†</sup>Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No Compliance Monitoring is required; **PMP** - Preventive Maintenance Program, See Additional Conditions.

**U-27 Additional Conditions:**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC: See Emission Points Table.
  - b. PM: See Emission Points Table.
  - c. Opacity: See Comment 2.
  - d. TAPs: See Emission Points Table and Plant-wide TAP allowable emission rates on p. 20.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
  - a. VOC:
    - i. Monitor ongoing compliance by calculating monthly, a daily a volume-weighted average of the coatings used. Procedures used for this determination shall be those of Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Truck Topcoat Operations, EPA-450/3-88-018, December 1988.
    - ii. Use EPA Method 24 to determine the amount of VOC in the Coating. The following equation may be used as an alternate method to demonstrate compliance:

$$VOC_w = \sum_{i=1}^n \frac{V_i C_i}{V_t}$$

Where:

**VOC<sub>w</sub>** = the daily weighted average coating VOC content, as applied; and less water and exempt solvents, expressed in pounds of VOC per gallon of coating.

**n** = number of different coatings used on a coating line a given day.

**V<sub>i</sub>** = the volume of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**C<sub>i</sub>** = the VOC content of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

**V<sub>t</sub>** = total volume of all coatings applied each day on a coating line, less water and exempt solvents.

- b. PM: The owner or operator shall not operate the scuff booth or dry filter booth unless the particulate filters are installed and operating properly. The owner shall follow good operating practices for the particulate filters, including periodic inspection, routine maintenance as recommended by the manufacturer, and prompt repair of any defects. Proper operation of the fabric filter shall be ensured by maintaining records of inspections and routine maintenance activities and shall make these records available to the District upon request.
  - c. Opacity: See Comment 2.
  - d. TAPs:
    - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits. The specific indicators of control device performance are specified elsewhere in this permit.
    - ii. Continue to comply with Regulation 5.11 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
    - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
- a. VOC: Perform record keeping for VOCs as follows:
    - i. Record the quantity of paint and dilution solvent added to the coating application daily.
    - ii. Combine daily pour records with monthly tank level readings to determine monthly paint usage.
    - iii. Determine daily paint usage of each material by prorating consumption based on daily surface area coated.
    - iv. Determine daily usage and emissions by using calculation procedures in Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Truck Topcoat Operations, EPA-450/3-88-018.
    - v. Report all instances of non-compliance to the District no later than fifteen (15) days after the occurrence has been confirmed, notwithstanding Regulation 1.07.

- b. PM: The owner or operator shall not operate the scuff booth unless the particulate filters are installed and operating properly. The owner shall follow good operating practices for the particulate filters, including periodic inspection, routine maintenance as recommended by the manufacturer, and prompt repair of any defects. Proper operation of the fabric filter shall be ensured by maintaining records of inspections and routine maintenance activities and shall make these records available to the District upon request.
  - c. Opacity: See Additional Condition 2.b.
  - d. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
- a. Emission Unit ID number and Control ID number;
  - b. The beginning and ending date of the reporting period;
  - c. Identification of the operating parameters being monitored;
  - d. Number, duration, and cause of all exceedances (or a negative declaration, if none);
  - e. Description of the corrective action taken for each exceedance;
  - f. Occurrences and duration of each downtime and bypass.

**U-27 Comment/Explanation:**

- 1. Due to the nature of the process of E-26, no opacity monitoring is required, as the likelihood of visible emissions is nil.
- 2. Additional Condition 2.d is for demonstrating compliance with Regulation 5.11, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

### Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

### Off-permit Documents

| <u>Document</u>         | <u>Date</u>   |
|-------------------------|---------------|
| Rule Effectiveness Plan | 10 April 1995 |

### Alternative Operating Scenarios

The owner or operator did not request to operate under any alternative operating scenarios in its Title V permit application.

| Source-wide Hap Speciation |          |                        |           |
|----------------------------|----------|------------------------|-----------|
| HAP                        | CAS No.  | HAP                    | CAS No.   |
| Cumene                     | 98-82-8  | Methyl ethyl ketone    | 78-93-1   |
| Ethyl benzene              | 100-41-4 | Methyl-tert-butylether | 1634-04-4 |
| Formaldehyde               | 50-00-0  | Naphthalene            | 91-20-3   |
| Hexane                     | 110-54-3 | Toluene                | 108-88-3  |
| Glycol ethers (various)    | N/A      | Vinyl acetate          | 108-05-4  |
| Methanol                   | 67-56-1  | Xylenes                | 1330-20-7 |
| Methyl isobutyl ketone     | 108-10-1 |                        |           |

Note: HAPs cited in the table above are those currently known to be used at this plant.

| Insignificant Activities                    |          |                                |
|---|----------|--------------------------------|
| Description                                 | Quantity | Basis                          |
| Internal combustion engines fixed or mobile | Various  | Regulation 2.02, Section 2.2   |
| Presses extruding metal/mineral/wood        | Various  | Regulation 2.02, Section 2.3.1 |
| Brazing, soldering or welding equipment     | Various  | Regulation 2.02, Section 2.3.4 |

| <b>Insignificant Activities</b>  |                 |  |
|--|-----------------|--|
| <b>Description</b>   | <b>Quantity</b> | <b>Basis</b>   |
| Emergency relief vents or ventilating systems (not otherwise regulated)        | Various         | Regulation 2.02, Section 2.3.10  |
| Lab venting and exhaust systems (non radioactive materials)                    | 2               | Regulation 2.02, Section 2.3.11  |
| Ventilation systems - bakeries & restaurants                                   | Various         | Regulation 2.02, Section 2.3.12  |
| Blast cleaning - abrasives in water  | Various         | Regulation 2.02, Section 2.3.13  |
| Washing or drying fabricated metal or glass; non VOC use; no oil or solid fuel | Various         | Regulation 2.02, Section 2.3.15  |
| Residential/domestic equipment   | Various         | Exempt   |
| Indoor pm collectors venting indoors; non 5.11, 5.12, or 5.14 related material | Various         | Regulation 2.02, Section 2.3.21  |
| Portable diesel or gasoline storage tanks                                      | Various         | Regulation 2.02, Section 2.3.23  |
| Diesel fuel storage tanks (emergency use only)                                 | 2               | Regulation 2.02, Section 2.3.25  |
| Closed pressure storage vessels  | 2               | Regulation 2.02, Section 2.3.26  |
| Portable tote tanks for raw material shipment of solvent - based coatings      | Various         | Tote tanks are kept closed when not in use. Emission from tanks are negligible, and are accounted for by process material balance. |
| Backup generators for emergency power. (natural gas/propane; < 500 hrs/year)   | Various         | Generators normal use is very low. Natural gas usage accounted for under Part 70 Emission Cap.                                     |
| Wastewater Pretreatment system.  | 1               | Emissions insignificant  |
| Frame cutoff   | Various         | Particulates from frame cutoff negligible. Natural gas usage accounted for with Emission Unit 00.                                  |
| Fluid Fill (hydraulic fluids, oil, anti-freeze) and Lubricating operations.    | Various         | Emissions insignificant due to low vapor pressure of materials used.   |



| Insignificant Activities  |          |  |
|---|----------|--|
| Description   | Quantity | Basis  |
| Miscellaneous maintenance procedures including lubrication, grinding, cleaning, woodworking, etc. | Various  | Negligible emissions   |
| Direct heat exchangers < 10 MM Btu/ hr  | Various  | Regulation 2.02, Section 2.1.1 Natural gas usage accounted for under Part 70 Emission Cap.         |
| Unpaved Roads and lots, including temporary construction access roads.                            | Various  | Emission sources are transitory. Best management practices used to limit dust during construction. |

1. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
2. Activities identified in Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
  - a. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirement which shall include a < 20% opacity limit for facilities not otherwise regulated.
  - b. No periodic monitoring shall be required for facilities designated as insignificant activities.